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APPENDIX

METROPOLITAN WASHINGTON AIRPORTS POLICY

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Final Environmental Impact Statement Comments and Responses

August 1980

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
Washington D.C.

TD 448.

APPENDIX

METROPOLITAN WASHINGTON

AIRPORTS POLICY

FINAL ENVIRONMENTAL IMPACT STATEMENT

Comments and Responses

August 1980

U.S. Department of Transportation
Federal Aviation Administration
Washington, D.C.

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Washington, D.C. 20402

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INTRODUCTION

INTRODUCTION

This Appendix to the Final Environmental Impact Statement for the Metropolitan Washington Airports Policy includes the comments, both written and oral testimony from the public hearings, received from various interested agencies, governments, organizations and individuals. Also included are responses to these comments. In most instances, the responses are fully contained within this Appendix, however, in certain instances where additional information has been provided in the FEIS, the reviewer is directed to the appropriate section of the FEIS document.

In view of the large volume of comments and testimony on the DEIS, the supplemental DEIS and the NPRMs, an individual response to each comment is not practical. Since many of the same issues were raised several times by different commenters, individual responses would be unduly repetitive. The comments received have been carefully reviewed and, in accordance with CEQ regulations, significant issues raised by one or more commenters have been summarized, without bias to the meaning. The comments and responses are provided in this Appendix in the following order:

* Federal Agencies
* State and Local Governments
* Aviation Industry
* Local Business and Chambers of Commerce
* Cities, Airports and Chambers of Commerce Outside of the Washington Area
* Local Citizen Groups and the General Public
* Members of Congress

The comments and responses are directed to technical comments and views concerning policy alternatives. The FEIS and this Appendix present the environmental documentation and positions taken by interested parties with respect to the alternative policy options. The comments received and documented within this Appendix have led to the establishment of five alternative policy options. After review of the FEIS and this Appendix and review of other related data, the Secretary of Transportation will announce a policy for Metropolitan Washington Airports from within the range of these alternatives. For further information concerning the public involvement program, see the Public and Agency Involvement section of this FEIS.

FEDERAL AGENCIES

Comments and Responses

READEX

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

MAR 14 1980

Mr. James A. Wilding
Director
Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport
Hangar 9
Washington, DC 20001

Re: Metropolitan Washington Airports Policy

Dear Mr. Wilding:

We have reviewed the Supplement to the Draft Environmental Impact Statement for the Metropolitan Washington Airports Policy, and have classified it in EPA's reference category EP-2. The attached copy of the Definition of Codes for the General Nature of EPA Comments provides a more detailed description of this rating. This classification will be published in the Federal Register in order to meet our public information obligations.

Although this Supplement to the DEIS has clarified the discussion and comparison of the policy alternatives that appeared in the March 1978 DEIS, we believe that the Supplement has not resolved many of the substantive issues that were raised in our review of the original document. These issues include the noise and air quality impacts of the proposed policy, and the selection and analysis of the policy alternatives. Our detailed comments on these topics are included below.

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Of particular concern to us is the fact that the proposed policy will increase airport related air pollution concentrations at Washington National Airport, resulting in continued violations of Federal Ambient Air Quality Standards. EPA is not in a position to endorse a policy alternative that results in violations of these standards. We believe that this issue, and the others discussed below, should receive further attention in the Final EIS. If these issues are not resolved, there is a possibility that the FEIS will receive a rating of "Environmentally Unsatisfactory," and the project would be referred to the Council on Environmental Quality. 1

Comment No.

Noise Impacts

1. Implementation of the proposed policy will still leave a 13 square mile area surrounding Washington National Airport within the NEF 30 noise contour. Although the Potomac River makes up much of this area, significant amounts of park land and residential property are also included within this noise impact area. Since both EPA and FAA are committed to reducing noise levels below NEF 30 in residential areas, the proposed policy does not appear to be consistent with the Agencies' noise limitation goals. 2

2. The results of the noise analysis do not permit a detailed comparison of the policy alternatives because many important factors have not been quantified. There is no measurement of the land uses within the NEF 30 contours surrounding the airports, nor is there a discussion of the current or projected number of residents that would be effected by this noise level. Since future changes in land use and population density could alter the current pattern of development near the airports, it is difficult to estimate potential impacts without this kind of analysis. At Washington National Airport, for instance, the significance of the reduced NEF 30 contour depends largely on the kind of development that occurs within that area during the next ten years. For these reasons, we believe that the land use and population trends for the areas surrounding the sirports should be examined in the FEIS. 3

3. The Noise Exposure Forecast (NEF) measurement system includes a heavy weighting penalty for nighttime aircraft operations. We are concerned that the reduction of the NEF 30 contour around Washington National Airport may have resulted largely from the revised operations schedule at 10:00 p.m. The FEIS should clarify the sensitivity of the NEF results to the proposed revision of the curfew policy. 4

Air Quality and Surface Transportation

1. The air quality analysis indicates that several Federal Ambient Air Quality Standards will be exceeded near Washington National Airport in 1990 under the proposed policy. Of particular concern to us are the two violations of the 8-hour Carbon Monoxide Standard. The violations will exist despite a substantial reduction in background 8-hour CO levels (from 15 ppm to 6 ppm), and they occur at receptors on airport property that will experience increases in airport related emissions. Since these violations appear to be a direct result of the increased operations under the proposed policy, the FEIS should develop measures to eliminate this problem. 5

Comment No.

2. The Supplement to the DEIS includes lower estimates of 1990 traffic volumes near National, and we believe that these revisions should be explained more completely. The estimate of increased Metro ridership (p. III-17) should also be documented, and the relationship between the Metro and traffic projections should be explained. 6

3. As we discussed in our review of the DEIS, we believe that the interaction of the surface and air transportation systems in the Washington, D.C. metropolitan area should receive additional attention in the EIS. One of the primary reasons for the proposed increase in service at Washington National Airport is its convenience to downtown Washington, but there is little discussion of ground transit operations that would increase the accessibility of Dulles or Baltimore-Washington International Airports. We consider this an important issue that should be addressed in the EIS. 7

Study of Alternatives

1. We still believe that this EIS is biased toward justifying a high level of flight activity at Washington National Airport. The proposed policy involves increased passenger service at National despite many associated environmental problems. We are convinced that the air travel requirements of the Washington, D.C. area can be met in an environmentally satisfactory manner, but do not believe that the EIS goes far enough in developing workable alternatives to the proposed policy. Furthermore, the violations of air quality standards resulting from the proposed policy appear to necessitate a reevaluation of the preferred policy alternative. 8

2. It is not clear why the FAA has chosen the figure of 18 million passengers per year as its proposed service ceiling at National. The choice of this figure should be explained in the FEIS. 9

3. Part of the alternatives analysis involves a discussion of National's role as the area's "short-haul" airport, but National does provide direct (same plane) service to cities throughout the country. This service calls into question the significance of the 650 mile perimeter rule and the short-haul role of the airport. We believe that the nature of National's service should be explained more clearly, and its designation as a short-haul airport should receive further discussion. 10

Due to the air quality impacts discussed above, and our other reservations included here and in our letter of January 29, 1978, we encourage the FAA to reconsider its selection of the proposed policy alternative. It may be helpful for us to meet and discuss these issues before the Final EIS is prepared. If you have any questions concerning our comments, please contact Mr. Eric Johnson of my staff at (215) 597-4388.

Sincerely yours,

R. S. Davis (for)

John R. Pomponio
Chief
EIS and Wetlands Review Section

Enclosure

APPENDIX II
DEFINITION OF CODES FOR THE GENERAL NATURE OF EPA COMMENTS

ENVIRONMENTAL IMPACT OF THE ACTION

LO--Lack of Objection

EPA has no objections to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

ADEQUACY OF THE IMPACT STATEMENT

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as reasonable alternatives available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonable available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revisions be made to the impact statement.

- NOTE: This page was retyped from poorly reproduced copy.

Federal Agency Comments and Responses

Environmental Protection Agency

Response 1 - The FEIS provides an environmental assessment of a range of policy options. The Department of Transportation will select a policy for Metropolitan Washington Airports from within the range of these alternatives. The air quality assessment in the FEIS provides the air quality impacts of the policy options. The Department is aware of the EPA concerns regarding violations of the Federal Ambient Air Quality Standards. The air quality analysis in the FEIS indicates that present violations of the Carbon Monoxide (CO) standard at National would be eliminated under all alternatives with the exception of the one receptor point under the Expanded Growth alternative and No Policy Change alternatives. The lowest concentration of pollutants at National would result from the Reduced Activity alternative. The primary and secondary particulate standards (annual geometric mean) and the secondary particulate standard (24-hour average) would be violated regardless of the policy option selected. CO emissions at Dulles would be within standards under all alternatives. In terms of regional Hydrocarbons(HC) emissions, which represent the key element in the establishment of ozone, the Reduced Activity alternative results in the greatest total load of HC emissions. This results largely from the amount of diverted surface vehicular traffic which occurs with the Reduced Activity alternative and is of significance due to Washington's existing regional ozone problems. Finally, it should be noted that the air quality analyses has assumed a "worst case" condition on airport property, as it was assumed in the environmental assessment that in 1990 no changes to the internal airport roadway system would be made. With the adoption of a policy, airport master planning could be undertaken and improvements to the roadway system could be made, thus the pollutant concentrations could be expected to be less than what is shown by the air quality analyses.

Further documentation of these affects of air quality at National Airport is contained in the Final EIS and in Response to Comment 5 following.

Response 2 - The noise analyses in the FEIS shows the relative differences in noise impacts among the alternatives under consideration at the three airports. Although it would be ideal to reduce the 30 NEF contour to exclude all parkland and residential properties, this would not be possible unless all commercial and most of the business jet aircraft were prohibited from using National Airport. This is not a feasible alternative given the role National must play along with Dulles and Baltimore-Washington Airports in serving the air transportation needs of the nation's capital. The forecast increase in the level of air passengers for the remainder of this century necessitates three major airports for this region. The two Controlled Growth alternatives and the Reduced Activity alternative significantly reduce the size and number of people living within the NEF 30 contour over the existing condition and No Policy Change and Expanded Growth alternatives.

Response 3 - The FEIS has incorporated the current land use and population information requested. Concerning the future, it is incumbent for local communities to make future land use decisions that are compatible with the future noise environment resulting from the MWA Policy.

Response 4 - The nighttime weighting penalty with the NEF noise metric accounts for approximately 50 percent of the reduction of the NEF 30 contour when comparing the 18 million passenger policy option in 1990 with the existing 1979 contours at National. Naturally, the time-above metric contained in the FEIS does not have a nighttime penalty.

Response 5 - The air quality analysis presented in the Draft Environmental Impact Statement (DEIS) indicated an eight-hour background level of 6 ppm. Referring to the figures referenced in, Air Quality Implications of Growth Forecasts: 1980, 1985, 1995, prepared by the Metropolitan Washington Council of Governments (COG) in March 1977, the urban eight-hour carbon monoxide background levels were presented as a 2 - 6 $mglm^3$ range of CO levels. In the DEIS, the upper limit to this range was presented, erroneously, as 6 ppm not the 6 $mglm^3$ converts to 5.2 ppm, which would not have exceeded the eight-hour standard for any receptor under the proposed policy in the DEIS for 1990 at National. In the Final EIS, the entire range of 2 $mglm^3$ - 6 $mglm^3$ was presented to illustrate the possible minimum and maximum CO levels to be expected in the vicinity of National Airport. Under the No Policy Change Policy and the Expanded Growth Policy at National, receptor 10, located near the terminal, is shown to equal or exceed the eight-hour CO standard.

Response 6 - The Supplement to the Draft EIS included the proposed I-595 improvements. Recent contact with the Virginia Department of Highways has indicated that this improvement will likely be modified from Interstate status to a high capacity urban arterial. As such, revised traffic projections received from the Virginia Highway Department have been used to establish traffic volumes in the vicinity of National Airport. A ridership of 20 percent was assumed from National Airport for all 1990 alternatives. This estimate was considered conservative in that present usage has been documented to be between 15 and 18 percent and as the Metro system is completed and access to the system is more convenient to passengers at National, the Metro usage would be expected to increase. Should the Metro usage exceed the 20 percent estimate, corresponding reductions in roadway traffic would result.

Response 7 - See the Surface Traffic sections at Dulles and Baltimore-Washington International in the FEIS for further discussion on ground transit operation.

Response 8 - See Response Number 1. The EIS does not attempt to justify a high level of flight activity at National Airport. The MWA Policy selected will balance a complex combination of competing

interests in regard to the future of the two Federal airports. The Policy Options presented in the FEIS were developed after consideration of public comment received from the circulation of a Draft Environmental Impact Statement in 1978 and a Supplement to that EIS in 1980. A total of 7 public hearings were held and approximately 1,500 comment letters received. The 1978 DEIS considered 32 alternatives. These alternatives have been narrowed to what is contained in this FEIS.

Response 9 - The FEIS contains a range of policy options with different passenger ceilings. The impact of each is assessed in the FEIS. The concept of a ceiling is for the purpose of limiting growth and ultimately diverting flights from National to the other regional airports. The MWA Policy will balance a complex combination of competing interests in regard to the future of the two Federal airports. When an MWA Policy is announced, an explanation of the entire policy will be provided.

Response 10 - The FEIS contains a range of policy options with various perimeter configurations. None of the perimeter or policy options attempt to directly control the scheduling practice of individual airline equipment (i.e., support or eliminate some plane service to cities across the country from National). A perimeter, however, heavily influences the travel patterns of air passengers. One should not assume that some aircraft long-haul service out of National, that eventually finds its way to the West Coast, for example, will contain a majority of Washington, D.C. passengers. See the air service section for National in the FEIS (Table III-22).

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

APR 28 1980

Honorable Neil Goldschmidt
Secretary
U.S. Department of Transportation
Washington, D.C. 20590

Dear Secretary Goldschmidt:

This responds to your request for the Department of the Interior's comments on the Metropolitan Washington Airports Policy Supplement to the Draft Environmental Impact Statement (SDEIS) for Arlington, Fairfax, and Loudoun Counties, Virginia.

The document addresses two Federal actions concerning the operations of Washington National Airport (DCA) and Dulles International Airport (DUL). The first action is the Federal Aviation Administration's existing operation of DCA and DUL. The second action discussed is the Department of Transportation's proposed policy on the future operation of DCA and DUL.

As pertains to the development of DUL, this Department raises no objection to the actions and policies proposed. However, we are concerned about the impacts and expansion of DCA that would be brought about by an implementation of the proposal as presented to date.

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COMPLIANCE WITH NATIONAL POLICIES

As stated in our letter of August 1, 1978, commenting upon the draft environmental impact statement (DEIS), we find that certain actions proposed are inconsistent with national policy concerning the protection, preservation and enhancement of the environmental quality of the many national parks and memorials in the Washington, D.C., area. It is our position that the memorials and parklands within the Washington, D.C., area are (1) of significant and unique national value and (2) must be afforded the highest level of protection in order to permit the American public's enjoyment of them and a chance to reflect upon the cultural heritage they represent. Aircraft noise effectively disrupts such 1

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enjoyment. This conflict should be acknowledged in the final environmental impact statement (FEIS) and all possible mitigating measures should be developed and discussed in it.

We also wish to point out that the DEIS does not reflect Department of Transportation compliance with Section 16(c)(1)(A) of the Airport and Airway Development Act of 1970 (P.L. 91-258). In that act, it is declared that any airport project (or in this case, policy) shall be approved only if it is reasonably consistent with plans of planning agencies for the development of the area in which the airport is located. It is clear that your proposed policy statement, as it relates to Washington National Airport (DCA), runs counter to the documented recommendations and positions of both the National Capital Planning Commission and the Washington, D.C., Council of Governments. While we understand that the FAA may exempt DCA and Dulles International Airport because they are not subject to the grant procedures authorized by the act, we would expect the FAA to comply with its own regulation. If exempted, the FEIS should clarify the FAA's justification for such an action. 2

We also would submit that the DEIS and SDEIS, as they relate to DCA, must evaluate DCA in the context of the national policy set forth in Section 16(c)(4) of the Airport and Airway Development Act of 1970 (P.L. 91-258). Section 16(c)(4) declares that it is national policy that airport development projects authorized under Federal law "shall provide for the protection and enhancement of the natural resources and the quality of environment of the nation." It could be held that FAA is inconsistent and possibly arbitrary if it does not apply this national policy to DCA while applying it to airports where FAA is not the proprietor. 3

SCOPE OF DOCUMENT

The FAA's review of the 1978 hearing record (as presented on page II-2 of the SDEIS) and the conclusions drawn from it do not reflect a complete evaluation of the issues. The identification of only two perspectives (one national and the other local) results in a subjective development of alternatives.

The national perspective describes DCA as uniquely convenient to the Nation's Capital, and assumes that DCA should provide immediate access to downtown Washington. The local perspective is defined as that of local communities being subjected to high levels of aircraft noise and, as a result, opposing DCA's continued operation. From these two definitions of viewpoint, the supplement frames the four alternatives that are discussed. 4

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Neither of these perspectives, either in themselves or in combination, represents a full appraisal of the issues; nor does the array of alternatives developed address or evaluate all feasible and prudent alternatives. This should be rectified in the FEIS.

By using the perspectives defined in the supplement, the FAA has not given adequate consideration to the national significance of the Nation's Capital. As framed in the discussion, the issue appears to pit a local group of area residents against national business and political interests. The scoreboard approach to summarizing the 1978 public comments (table II-2) is evidence of this. By so identifying interests, the document misses the significance of the Nation's Capital and the protection and enhancement of its environment.

The monuments and Mall of Washington are of the Nation's most prominent landmarks. We hold that the DEIS and the SDEIS are inadequate until Washington, D.C. is recognized in its true perspective, and until alternatives are developed and fully evaluated to give adequate consideration to the values of our Nation's Capital and its environs. We submit that the importance of these Washington, D.C., landmarks transcends alternatives discussed in either the DEIS or the SDEIS and clearly mandates the FAA to provide a careful and thorough look at alternatives that are specifically addressed to the issue of the area's national significance to the entire citizenry. 5

By not addressing the relationship of a number of proposed development projects for DCA currently under study, the document does not provide a full picture of the potential impacts that the operation and policy would cause. Currently there are underway, or being considered, studies to (1) extend the overruns on runway 18/36 ("Concept Study for a Safety Overrun Area Modification at Washington National Airport," November 1979), (2) upgrade the traffic pattern and access to DCA ("Washington National Airport/Road Study," February 1977), and (3) initiate a master planning effort for DCA. Because these planning efforts interrelate directly with the policy under consideration, we find the scoping of the document is excessively narrow to the point of predetermining the final decision. 6

PRELIMINARY SECTION 4(f) COMMENTS

As stated in our August 1978 letter, we contend that section 4(f) is applicable to the the proposed actions of the Department of Transportation. It is our opinion that noise levels above 60 dBA at major national memorials and historic sites (such as the Lincoln and Jefferson Memorials and Arlington National Cemetery) and above 70 dBA at all other parks, recreation areas, and historic properties constitute a use of these lands under section 4(f). 7

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Any action by the Department of Transportation which would subject protected lands to uses other than those for which the lands were reserved and dedicated, constitutes a "program or project" under section 4(f). A continuation of the current operation policies would clearly involve an increase in use of 4(f) lands. Such a policy action would result in increases in noise levels. An adoption of the no policy change alternative would result in a de facto implementation of a policy of unrestricted use of DCA and uncontrolled development of the facility. Adoption of such a policy is a clear use of parklands.

Reasonable review of this document has been made exceedingly difficult due to the way the applicable noise data is presented. The DEIS presented 1976 base case noise exposure conditions for "selected historic sites" in the vicinity of DCA (table V-27), and projected noise exposure in 1990 under the then proposed condition. In our review of the DEIS, we pointed out that the projections of noise duration above the 65 and 75 dBA level would increase according to the data supplied in the 1978 DEIS document.

The SDEIS at first glance appears to resolve this problem in that the figures in table A-2 (1990 proposed policy) present an array of noise levels that are consistently lower than the figures presented on table A-1 (1979 existing conditions). However, when the SDEIS proposed policy noise exposure figures are compared to the DEIS base case (1976 rather than 1979), there is still a projected increase in the length of time parklands will be subjected to noise levels above 75, 85, 90, and 95 dBA. 8

It is not reasonable to fail to continue to use the 1976 base case figures as a means of evaluating noise projections in that the 1979 figures (described as "existing conditions") are not in fact a base case but reflect an increase in air traffic at DCA of 10,000 air carrier operations, 28,000 other operations and 3.5 million passengers per year. This further supports our opinion that the proposed policy constitutes use of parklands

By "use" we are applying the term as it has been broadly construed in legal cases where environmental impact appeared to be a substantial question. In numerous cases, courts have found that Department of Transportation actions can be physically separate from the protected area and still constitute "use" within the meaning of the term. "Use" does not refer exclusively to the physical taking of land, but also embraces any interference with the use to which the 4(f) land in question has been dedicated.

A section 4(f) statement for DCA is required and should give special consideration to the criteria enunciated in the Citizens to Preserve Overton Park v. Volpe, 401 U.S 402 (1971), vis-a-vis, the highly significant nature of the Nation's Capital, in its analysis of the

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existence of feasible and prudent alternatives, and in proposing all possible measures to minimize harm. Since this Department has jurisdiction over the majority of the 4(f) lands that are impacted, you should maintain close coordination with us on this matter.

As portrayed in the FAA's "Washington National Airport/Road Study," dated February 1977, the favored solution to automobile traffic flow problems at DCA would be the construction of a major highway cloverleaf at the existing south access to the airport. The impacts of this upon the George Washington Memorial Parkway would be severe. Further encroachment upon parklands for highway access to DCA would be subject to section 4(f), as well as required specific permits from this Department. The issuance of such permits for these encroachments may be contrary to existing Department regulations. 9

ENVIRONMENTAL STATEMENT COMMENTS

We disagree with the premise held in the DEIS and continued in the SDEIS that projected reductions of noise (3-6 NEF) are sufficient to alleviate existing adverse effects. As a result of this acceptance of noise impacts by FAA, the alternatives discussed do not constitute a full array of reasonable and feasible alternatives. 10

The statistical projections of noise impact presented in tables A-1 through A-13 present an incomplete picture of what the impacts are, or will be, upon the various parks and historic sites in the area. We base this position upon the fact that the calculations are weighted to portray evening and night flights as being more intrusive than day flights. While this may be true within the context of residents living under air traffic lanes, such an evaluation cannot be applied to the Nation's Capital with its annual visitor population of 24 million (17 million visiting the National Mall, the Washington Monument Grounds, and the West Potomac Park area). Therefore, an evaluation of noise based upon daytime aircraft noise in and around the parks, memorials, and public buildings of the Capital should be used to measure the potential impacts of each alternative. 11

As presented in the DEIS supplement, the noise forecasts for each alternative depend upon both the introduction of new, quieter, aircraft and the retrofitting of existing aircraft. By doing so, the FAA appears to be applying the "best case" conditions to the amount of noise reduction being predicted. Considering the reasonable expectation that the deadlines for such retrofitting may be extended, as well as the probability that new, quieter aircraft will not be as immediately available as is implied, the projections of noise as provided in tables A-1 through A-13 are subject to a significant amount of question. An adequate level of review of the potential noise impacts upon parklands, or for that matter the surrounding community, is not possible due to the 12

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way the noise projections are formulated and presented. A presentation of noise projections should be made displaying the following essential factors or possibilities.

An extension of the retrofit date to sometime later than 1985 as per Federal Aviation Regulation (FAR) Part 36, is a possibility. This would affect noise level projections by a significant amount and would result in the current tables and graphical presentations reflecting an excessively conservative projection of noise impacts. Therefore, in addition to a "best case" evaluation, a "worst case" evaluation should also be developed so that an adequate appraisal of noise impacts can be presented.

Until such time as FAR 36 is fully implemented, there may well be a predictable increase of noise levels on a yearly basis due to the continued use of older and louder aircraft. Since it is not clearly indicated how much of the noise predictions depend upon the FAR 36 implementation, nor is it clear (though implied) that noise levels will immediately begin to decrease once the proposed policy is implemented, the accuracy of the DEIS and SDEIS noise projections is subject to question. In order to accurately predict the noise levels that will be generated by the various alternatives, the computer modeling must develop yearly "worst case" projections so that they may be compared with the figures presented to date. 13

The DEIS and SDEIS do not provide an adequate discussion of natural systems surrounding and potentially effected by the proposed actions. The FEIS should include discussion of operational impacts of both airports (with special consideration of DCA as its operation relates to the Potomac River) as such operations relate to spilling and dumping of aviation fuels into the surrounding aquatic system. Aviation fuels are extremely toxic to fin fish and other aquatic organisms. In addition to the direct source of aviation fuel as a pollutant, a common source of aviation fuels and other toxic material associated with the operation of airports is surface runoff. No mention is made of the impact of surface runoff to surrounding aquatic habitat nor is there any discussion on present or proposed measures to control storm water runoff. The handling of aviation fuels and other toxic materials should be fully monitored and steps taken to prevent these materials from entering the Potomac River. Such measures should be fully discussed in the FEIS. 14

The present ecological situation at DCA is not adequately described. Approximately 860 acres of important wetland and shallow water habitat were filled to create the airport in the 1940's. This permanently removed a large protective area from the Potomac River aquatic system. Encroachment like this has contributed to the decrease of viability of fisheries in the Potomac which had once contributed greatly to the 15

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Chesapeake Bay fisheries catch. Future construction plans such as the runway overrun which would fill an additional 7 to 11 acres of wetlands and shallow water habitat will further aggravate this impact. The overrun plans should be fully discussed in the FEIS.

We are concerned that a number of comments and concerns expressed in our letter of 1978 on the DEIS have not been responded to or acknowledged in the SDEIS. The issue of accelerated structural deterioration of historic structures and monuments due to the continued subjection of these structures to aircraft noise induced vibration and aircraft-related air pollution is of continuing concern. To our knowledge, no evaluation or examination of this has been undertaken by FAA since we identified this impact and requested an assessment of it in 1978. 16

It is clear to us that the most pervasive influence upon the operations of DCA is the air travel market place. High demand for the convenience of DCA for both the visitor and the various air carriers is frequently cited as a major factor. It is our belief that the majority of air passengers using DCA are responding to the sales and promotional efforts of the airlines. If an equal effort were made to "sell" Dulles (DUL) and Baltimore-Washington International (BWI) Airports, the air traffic pressure would not be as high on DCA. FAA, through its DEIS and SDEIS, fails to acknowledge or address this highly significant factor. 17

The supplement continues the proposition that a limitation of schedules is the appropriate way to place limits upon air traffic. All aircraft landings and takeoffs should be identified and recognized in any control efforts. Extra sections must be disallowed in any such control effort if such limits are to have any meaning. 18

The DEIS and SDEIS refer to the need for the extension of the "overrun areas" for runway 18/36 as well as for an extensive capital improvement program for the facility. The proposals are described in detail in the "Concept Study for a Safety Overrun Area Modification at Washington National Airport," November 1979, and the previously discussed "Washington National Airport/Road Study," February 1977. These elements of DCA expansion would also require the use of parklands and, thus, require compliance with both the National Environmental Policy Act and section 4(f). We, therefore, conclude that the DEIS and SDEIS are not complete evaluations of the potential impacts on parklands; and that they are inadequate under both NEPA and section 4(f) requirements. 19

SUMMARY COMMENTS

The "preliminary section 4(f) comments" provided herein and in our August 1978 letter are provided to give you an early indication of our thoughts concerning the chief 4(f) issues involved in the FAA's actions. They do 20

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not represent the results of the mandated formal consultation with this Department as required by section 4(f) of the Department of Transportation Act. That requirement will be fulfilled only when this Department separately comments on any section 4(f) statement which may be prepared and approved by the FAA for circulation. As stated in our previous letter, we stand ready to consult with you and to provide technical assistance in the development of any section 4(f) statement.

We strongly recommend that the following points be addressed in the final environmental impact statement.

1. Alternatives should be developed and evaluated that would provide for the greatest possible reduction of noise levels at DCA with the goal below 60 dBA at major national memorials and historic sites, and below 70 dBA at all other parks, recreation areas, and historic properties. The reduction of noise to approach these levels should be the primary goal of these additional alternatives. It is clearly necessary, in our opinion, to develop and evaluate such alternatives in order for the Secretary of Transportation to make a section 4(f) determination and a section 16 (c)(4) finding. 21

2. Limitation of yearly passenger levels at DCA should be addressed in alternatives that provide for both controls on numbers of enplanements as well as control of the total number of aircraft landings and takeoffs. Since it is the aircraft themselves that generate noise, discussions of extra sections appear to confuse the issue. Therefore, maximum levels of aircraft using DCA should be based upon a simple quota of planes taking off and landing with consideration given to craft that generate levels of noise that would fit within the standards of 60 dBA for the major monuments and memorials and 70 dBA for all other parklands. The limitations on quiet aircraft meeting these noise standards would thus relate to traffic volume (both airside aircraft volumes and landside motor vehicle volumes) and safety. It is clearly necessary to develop and evaluate such alternatives in order to reasonably respond to the mandate under section 4(f) that all feasible and prudent alternatives be addressed. 22

3. No discussion of the operation of DCA would be complete without a thorough analysis of the necessity for the facility. This evaluation must include thorough identification and evaluation of the levels of inconvenience that are claimed for use of DUL or BWI instead of DCA . 23

4. The FEIS should provide adequate description of the effects the proposed action and alternatives may have upon the natural environment with specific consideration being given to the impacts of aviation fuel and storm water runoff upon aquatic organisms. This should include provisions for the development of monitoring and control programs as may 24

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be warranted. Section 10/404 permits (pursuant to the River and Harbors Act of 1899 and the Clean Waters Act), are required to implement parts of the contemplated capital improvements for DCA. This Department considers the proposed policy and the extension of the runway safety overrun, as well as any other proposals to fill or construct facilities in the Potomac River, as integral parts of the same issue and, therefore, subject to review at this time.

5. In answering the question of convenience versus real need by passengers for DCA, the FAA should evaluate an alternative that endeavors to relocate air passenger demands by use of convenient alternative modes of air transportation or airport access systems such as the intown heliport concept that is currently under study by the Council of Governments and the development of a sophisticated limousine connector service as has been suggested repeatedly by speakers at the hearings on the SDEIS. In addition, thorough consideration should be given to the use of Andrews Air Force Base for air carrier service as a means of reducing the loads on DCA.

6. An alternative should be developed which presents and assesses a plan to eliminate DCA flights in both the early evening hours and on weekends. Concurrently, provisions should be made for upgrading Dulles and BWI to handle the diverted air traffic. In addition, adequate study should be given to the development of alternative solutions to provide access to air transportation facilities such as the development of METRO or a light rail system to DUL and/or Andrews AFB. Such an alternative should provide for no capital improvement to DCA, and only such maintenance as would maintain DCA to minimum safety standards. Considering the significant amount of capital improvements currently being contemplated by FAA for DCA, a thorough cost benefit analysis over an extended time base should be developed to assess and compare the benefits of developing DCA as compared with providing access and facilities at DUL, BWI, Andrews AFB, and other potentially viable Federal and commercial facilities. 25

The Department of the Interior offers no objection to the two FAA actions described in the DEIS and its supplement as they pertain to Dulles International Airport.

We oppose any action, including the continuation of the existing policy, that would allow any temporary increases in operations of Washington National Airport.

We are providing a copy of this letter to the Assistant Secretary for Policy and International Affairs, U.S. Department of Transportation to inform him of our position on this matter.

Thank you for the opportunity to comment on the supplement to the draft environmental impact statement.

Sincerely,

Lewis D. Andrus

SECRETARY

cc: Assistant Secretary for Policy and International Affairs, US-DOT

Mr. James A Wilding
Metropolitan Washington Airports

Department of the Interior

Response 1 - The Department of Transportation (DOT) recognizes the mandate of the Department of the Interior (DOI) to afford the highest level of protection for the memorials and parklands in the Washington D.C. area. It is also incumbent for DOT to recognize its responsibilities to provide service to the public as the proprietor of two of the major airports serving the air transportation needs of the Nation's Capital. The FEIS contains an environmental assessment of a range of policy options. Three of the policy alternatives under consideration, the two Controlled Growth at National alternatives and the Reduced Activity at National alternative, all result in measurable reductions in noise exposure on parklands and historic sites.

Response 2 - The Airport and Airway Development Act of 1970 (P.L. 91-218) applies to the grant of aviation trust funds for direct airport development by airport proprietors. National and Dulles Airports are not eligible for funding under this act.

The FEIS contains a range of policy options, including a no growth option that is identical to the recommendation of the Metropolitan Washington Council of Governments (COG). DOT, consistent with its responsibilities will select a policy that balances the complex combination of competing interests that influences the two Federal airports, including impacts on parklands.

In regard to the National Capital Planning Commission (NCPC), the policy options in the FEIS do not conform with the most recent (NCPC) position to close National Airport by 1990. In 1978, NCPC comments to the DEIS on an MWA Policy stated:

"The anticipated air passenger volumes confirm that by 1995 the Bi-region will require three commercial aviation ports to handle the projected volumes. If Washington National Airport were to be phased out of operation by 1995 a new site would be required for an airport somewhere in the Washington Metropolitan Area. For the purposes of the review of the proposed policy for National Airport it is assumed that it is impractical to consider that National would be phased out of existence within the next 20 years and it will continue to be an important element in the region's air transportation system.

The phase out of National is not a reasonable alternative under consideration given the responsibility of DOT to serve the air transportation needs of the Nation's Capital. The forecast increase in the numbers of air passengers through the remainder of this century necessitates three major air carrier facilities in this region.

Finally, the Airport Act (P.L. 91-218) applies to airport proprietors whose considerations and responsibilities are mostly local in scope. National and Dulles as federally owned facilities

serving the Nation's Capital have a national role and consistency that is unique among airports. These two Federal airports should not be considered as strictly local interest facilities.

Response 3 - Section 16 (C)(4) of the Airport and Airway Development Act is not applicable to Dulles and National. See response to comment 2. In any case that law applies to the use of federal trust funds for direct development involving airport location (new airport), a major runway extension, or runway location (new runway). The MWA policy effort involves none of these actions.

Response 4 - In 1978, FAA issued a proposed policy for the two Federal airports with a Draft EIS that analyzed 32 policy alternatives. The written comments and oral testimony revealed sharp differences of opinion on an appropriate role for Washington National Airport. These differences of opinion were repeated throughout the large docket of comments and centered about two opposite positions. One group held that National should have a significantly reduced regional role, while another equally large group desired an expanded role for National. Table II-2 o. page II-11 of the Supplement to the DEIS summarizes the written a· i oral testimony received on the 1978 DEIS. If anything, the c mments received from the review of the most recent policy proposal (January 1980) and Supplement to the DEIS revealed these same widely differing positions. The Supplement to the DEIS clearly highlighted the key issues and enabled all interested parties to measure the policy alternatives presented against their respective needs and to present counterproposals where necessary.

Response 5 - See discussion under Response Number 1. The impact on parklands is considered. Furthermore, both DOT and DOI have vital responsibilities in the Washington, D.C. area. It is incumbent that each agency recognize the mission and the responsibilities of the other.

Response 6 - DOT does not concur with the DOI position on the scope of this FEIS.

A. The proposed overrun for Runway 18/36 at National is for the purpose of increasing the level of safety for the existing facility. The proposed overrun is the subject of another EIS and would be proposed regardless of the final role selected for National among the alternatives under consideration. It does not bear upon the policy decisions.

B. The Washington National Road Study of 1977 was a preliminary concept study that has led to no development. No upgrade or change in roadway access for National will occur before the role for the airport as defined by the MWA Policy is adopted.

C. The master planning effort will redesign National to fit the role designated by the MWA Policy. In other words, the redesign effort for the airport cannot commence until the MWA Policy defines the role for the facility.

Response 7 - The existing operation of National and Dulles Airports is an ongoing action that does not require daily or other recurring approval. Any significant change in the operation of the airports, however, requires the consideration of the action's effect on, among other items, parklands.

An MWA Policy that results in no change or a reduction in noise impacts on parklands will not be subject to Section 4(f) of the DOT Act. DOT believes that a reduction in noise impact cannot be considered a taking of parklands.

DOT does not concur with the DOI opinion that a 60 dBA noise level at major national memorials and historic sites and a 70 dBA level at other parks, recreation areas and historic properties constitute a use of these lands under 4(f). No supporting analysis has been presented to justify that these levels constitute a use of parklands.

As an example, one could not discriminate against only aircraft noise signals above 60 dBA. If sound levels above 60 dBA are not acceptable in the parks and at the memorials, all noise sources above this level would have to be considered inconsistent with park use. Sound levels above 60 dBA would include fireworks displays, music concerts, traffic on adjacent roadways, human voices (outdoor conversation with slightly raised voice), crowds of visitors, weather (thunder, rain, wind, etc.) and some wildlife. The point being that these noise levels are arbitrary, based on no facts or analysis, and could not be achieved with the existing use of the parks and memorials even if all aircraft were removed from the area.

Response 8 - Table A-2 of the SDEIS shows a decrease in the time above noise levels for 1990, regardless of which base year is selected for comparison. Compare Table A-2 SDEIS with either Table V-27 1976 DEIS or Table A-1 SDEIS. There are minor numerical differences between the 1976 and 1979 base cases. However, the differences are in both directions: This reflects two primary changes: (1) A later and more refined version of the FAA Integrated Noise Model was used in the 1979 analysis as compared to the 1976 analysis and, (2) the 1979 SDEIS analysis corrected an error in the 1976 DEIS regarding the omission of commuter aircraft operations. (See page II-13 of SDEIS).

Comparing the time above noise numbers (dBA) for 1976 and 1979 base cases shows differences in both directions:

	1976				1979			
	65	75	85	90	65	75	85	90
Jefferson Memorial	335	98	13	0	315	99	17	0
Lincoln Memorial	339	119	9	0	346	117	13	1

Air carrier operations for calendar-years 1976 and 1979 at National Airport increased from 206,712 to 209,366, respectively. This is an increase of 2,654 not 10,000 as claimed by DOI.

Regarding the issue of a use of parklands, see discussion under Response Number 7.

Response 9 - See discussion under Response Number 6. No decision, not even a preliminary one, has been made on any roadway improvements. In addition, the FEIS traffic analyses depicts levels of service on the George Washington Memorial Parkway under the various policy alternatives.

Response 10 - See discussion under Response Number 1.

Response 11 - The time above noise levels in Tables A-1 through A-13 SDEIS are not weighted for evening or nighttime aircraft operations. These levels represent total minutes above the reference level for a 24 hour period.

Response 12 - The year of 1990 was selected for comparison of policy alternatives to assure that a reasonable extra margin of time was added to FAR Part 36 compliance dates in order to solve any potential slippage problem. The use of 1990 as a base for future analysis along with a forecast of the mix of aircraft in that year represent the most reasonable expectation of the noise environment in that year. FAA has not been overly optimistic in projecting the noise characteristics and mix of aircraft in that year.

Response 13 - See discussion under Response Number 12. The FEIS presents the range of policy options under consideration.

Response 14 - See pages 183 through 186 of the DEIS.

Response 15 - See discussion under Response Number 6. In addition, no firm commitment has been made to fill 7 to 11 acres of Potomac River bottom because of a proposed runway safety overrun. This proposal is the subject of a separate EIS and DOI has been involved in the scoping of the alternatives and EIS.

Response 16 - In regard to aircraft noise induced vibration, NASA and FAA made measurements of noise induced building vibrations near Dulles Airport during May and June 1976 and near Kennedy Airport

during January and February 1978. At Dulles, the study was conducted at Sully Plantation, Chantilly, Virginia and at three residential type homes located at various distances from the airport. Sully Plantation, a historic property, receives the greatest sound pressure levels of all monuments and historic properties in the vicinity of Dulles and National. The critical operation is Concorde with sound level measures reaching over 110 dBA.

For structural damage prediction, the safe structural limit recommended by the Bureau of Mines for blasting vibrations is 2.0 inches per second particle velocity.[1] This limit would prevent plaster cracking, broken windows, masonry cracks and other damage to buildings. A factor of safety applied to this limit results in a lower duration exposures such as an aircraft overflight. The measured levels at Dulles, even "worst" cases where a factor of 20 to 30 less that the damage criterion limit, and no damage to such building structures occurred or would be expected due to the Concorde levels measured.

In regard to historic structures around National, the sound pressure levels are much less than at Sully Plantation. The sound levels from jet aircraft at Gadsby's Tavern in Old Town reach to a maximum of just over 90 dBA (worst case) with most events under this level. In terms of sound energy, the exposure to Gadsby's Tavern is at least 20 times less than at Sully Plantation. Assuming 300 air carrier (jets) passing Gadsby's Tavern (takeoff) each day, each flight creating 114 dBA, the probability of failure of mortar in a chimney is 1.2×10^{-4} per year or 8,670 years between failures. In actuality, the failure probability is much less because the maximum acoustical pressures at Gadsby's Tavern are at least 1/20 the pressure associated with 114 dBA. For structures of this type, its use by the public (i.e., walking on floors and closing doors) induces greater forces than from aircraft sound induced vibrations.

In regard to more solid structures such as memorials, the author of FAA-RD-118 (R. L. Hersey) states "Our thorough analyses of the bridges has shown no mechanism by which this structural damage could occur for vibration from Concorde noise and hence, there is zero probability of breakage from this cause."

Essentially the mass of the structure contributes to its stength by providing a compressive stress which any tension stress (from acoustical pressure) must overcome. The acoustical pressure from aircraft will never be able to overcome the mass of these structures. Essentially, the illustration above represented a worst case condition with the Sully Plantation and Gadsby's Tavern.

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[1] U.S. Bureau of Mines, Blasting Vibrations and their Effects on Structures, Bulletin 656, 1971.

Finally, concerning the issue of aircraft-related air pollution, two points should be considered. First, DOI has not stated if a problem with structural deterioration exists at the memorials or historic properties due to air pollution in general. FAA knows of no such problem. Second, aircraft-related air pollution does not contribute significantly to regional air pollution (2 percent or less). At sites off of the airport it is almost impossible to isolate and identify aircraft-related pollutants. In other words, one could remove all aircraft from the area (region) and the pollutant concentrations at memorials and historic sites would not measurably change.

Response 17 - The convenient location of National Airport to downtown Washington, D.C., coupled with the frequency of service to a large number of cities, controls in large measure the utilization of the airports. The FEIS contains policy options that would bring about improved service patterns at Dulles and Baltimore-Washington Airports. However, the Federal Government cannot instruct the nation's airlines to increase promotional efforts at Dulles and Baltimore-Washington airports.

Response 18 - The status of extra sections are under consideration and will be determined with the final MWA Policy decision. Policy options containing a firm passenger ceiling would control the total number of air carrier operations. Essentially, the passengers on extra sections would be included in the total to be applied against the ceiling. The total number of air carrier operations would be the same with or without extra sections.

Response 19 - See discussion under Response Number 6.

Response 20 - See discussion under Response Number 7.

Response 21 - See discussion under Response Number 7 and Number 3.

Response 22 - See discussion under Response Numbers 7 and 18. In addition, the 60 dBA and 70 dBA levels referenced are not recognized noise standards. Applying these levels for aircraft using National and Dulles Airports would require the removal of all turbojet and a majority of propeller driven aircraft from both facilities. It would essentially require the closing of both facilities. This does not constitute a feasible or prudent alternative to the MWA Policy. It would be inconsistent with the FAA's responsibility to serve the air transportation needs of the Nation's Capital.

Response 23 - The Washington-Baltimore region currently and more so in the future will require 3 major airports to accommodate the air transportation needs of the region. See Aviation Forecast section of the FEIS.

Response 24 - See discussion under Response Numbers 6 and 14.

Response 25 - The FEIS contains a range of policy options, some of

which result in significantly increasing the utilization of Dulles and Baltimore-Washington Airports. New or improved access without an underlying policy base that results in improved service patterns at Dulles and Baltimore-Washington Airports will do little to increase utilization of these facilities. The FEIS contains a range of policy options with various operating hour limits at National. Elimination of weekend service at National is not a reasonable alternative as it would not be consistent with the responsibilities of FAA in serving the air transportation needs of the Nation's Capital and the thousands of citizens who use the airport on weekends.

The use of Andrews AFB for commercial traffic has been considered in the past and found to be incompatible with the mission of the Department of Defense at Andrews AFB. We have recently been advised that DOD's position has not changed.

In regard to the redevelopment of National, the Metropolitan Washington region will need 3 full service air carrier facilities to accommodate the aviation demand for the region. This conclusion has been reached by regional studies on the future aviation needs for the area. National will have a role to play as defined by the MWA Policy in serving a portion of the air transportation needs of the Nation's Capital. It is vital that National be redeveloped to better fulfill its role and the needs of the citizens using this facility.

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON, D.C. 20330

14 APR 1980

Mr. Joseph A. Wilding
Director, Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport, Hangar 9
Washington, DC 20001

Dear Mr. Wilding

The Air Force has reviewed the Supplement to the Draft Environmental Impact Statement (EIS) Metropolitan Washington Airports Policy dated January 1980, and the following comments are submitted.

a. Bolling AFB should benefit from a reduced noise impact. According to the noise contour comparisons presented in the EIS, the cumulative noise rating would be reduced by 10dB in an area of Bolling AFB encompassing approximately 250 housing units, several enlisted dormitories, and the community center.

b. We anticipate no impact on the air quality at Bolling AFB from the proposed changes.

c. The proposed changes in flight operations at Washington National Airport, Dulles International Airport, and Baltimore-Washington International Airport would have no effect on Andrews AFB flight operations.

Sincerely

Robert L. Klingensmith

ROBERT L. KLINGENSMITH, COL, USAF
Chief, Environmental Division
Directorate of Engineering
and Services

Cy to: SAF/MIQ
DASD(EE&S)

Department of Air Force

No response necessary.

UNITED STATES POSTAL SERVICE
475 L'Enfant Plaza, SW
Washington, DC 20260

March 18, 1980

Mr. James A. Wilding
Director
Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport, Hangar 9
Washington, D. C. 20001

Dear Mr. Wilding:

In response to your letter dated January 15, 1980, wherein you requested comments to the supplement to the Draft Environmental Impact Statement (DEIS) regarding Washington National Airport, this department wishes to submit the following comments:

The Postal Service has an average outbound daily mail volume of 11,200 pounds occurring after 9:30 p.m. at National Airport. The average inbound daily mail volume at National is 22,400 pounds occurring after 9:30 p.m.

By contrast, the average outbound daily mail volumes from Dulles and Baltimore after 9:30 p.m. are 4,000 and 10,200 pounds respectively. Also, the inbound average mail volumes at the above airports after 9:30 p.m. are 2,000 and 10,300 pounds respectively.

In addition to the above, there is an average of 2,900 pounds of mail dispatched after 9:30 p.m. from National Airport to cities not presently served by flights from Dulles or Baltimore during the same time span.

From the above findings, it has been determined that mail dispatched from or received at Washington National after 9:30 p.m. has the potential for overnight delivery. Mail that is not dispatched or received after the 9:30 p.m. curfew would require an additional day for delivery.

Sincerely,

Michael S. Coughlin
Assistant Postmaster General
Mail Processing Department

U.S. Postal Service

Response 1 - The FEIS provides an environmental assessment of a range of policy options. The various policy options contain various scheduling and curfew provisions. The Department will consider the impact on postal delivery. Some policy options could result in delay to some mail delivery as compared to current delivery practices. However, Dulles and Baltimore-Washington airports would remain open for 24 hour service.

STATE and REGIONAL GOVERNMENTS

Comments and Responses

metropolitan washington
COUNCIL OF GOVERNMENTS
1875 Eye Street, N.W., Suite 200, Washington, D.C. 20006 223-6800

COG #23

A-95 METROPOLITAN CLEARINGHOUSE MEMORANDUM

DATE: April 15, 1980

TO: Mr. James A. Wilding, Director
Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport
Hangar 9
Washington, D.C. 20001

SUBJECT: PROJECT NOTIFICATION AND REVIEW FOR

PROJECT: Supplemental Draft Environmental Impact Statement on Metropolitan Washington Airport Policy COG NO.: 80-04-019

APPLICANT: U.S. Department of Transportation/Federal Aviation Administration

The project title, COG number, and applicant's name should be used in all correspondence with COG concerning this project. Correspondence should be addressed to Mr. Walter A. Scheiber, Executive Director. The staff may be reached by telephone at 223-6800.

FINAL DISPOSITION

☐ We have concluded review of the above item and have determined that its nature does not warrant metropolitan comments. A copy of this memorandum and any attachments should accompany your application to indicate that the Metropolitan Clearinghouse review has been completed.

☐ A copy of the above item has been sent to _____ for review and comment, with direct response to be made by _____ Copies of any local agency comments which you receive should also accompany your application to the Federal agency.

☐ We have concluded review of the above item and have determined that it is in general accord with the metropolitan planning process and COG's adopted policies. A copy of this memorandum and any attachments should accompany your application to indicate that the Metropolitan Clearinghouse review has been completed.

☒ We have concluded review of the above item and submit herewith, the attached Metropolitan Clearinghouse Review Comments. A copy of this memorandum and the attached comments should accompany your application when submitted to the Federal agency to indicate that the Metropolitan Clearinghouse review has been completed. Resolution (R7-80) of the COG Board of Directors on recommendations on the airport policy options is included as a part of these Comments.

_____
EXECUTIVE DIRECTOR

WE APPRECIATE YOUR COOPERATION

Clearinghouse review comments will be valid for a period of two years from the date of this A-95 Metropolitan Clearinghouse Memorandum. All projects not submitted to the Federal funding agency within that period must be resubmitted to the Clearinghouse for update of the review comments before formal application is made to the Federal Government.

District of Columbia • Arlington County • Fairfax County • Loudoun County • Montgomery County • Prince George's County • Prince William County
Alexandria • Bowie • College Park • Fairfax City • Falls Church • Gaithersburg • Greenbelt • Rockville • Takoma Park

R7-80 (Amended)
Adopted April 9, 1980

METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS
1875 Eye Street, N.W.
Washington, D.C. 20006

RESOLUTION
ON
PROPOSED METROPOLITAN WASHINGTON AIRPORT POLICY

WHEREAS, the Metropolitan Washington Council of Governments (hereinafter called the COUNCIL) and the National Capital Region Transportation Planning Board (hereinafter called the TPB) are responsible for areawide comprehensive planning and transportation planning, respectively, in the Washington Metropolitan Area; and

WHEREAS, the COUNCIL's Land Use Policy Committee and the TPB on October 3, 1975, jointly recommended a plan for "The Future of Washington's Airports" which was developed in cooperation with the National Capital Planning Commission; and

WHEREAS, the Board of Directors of the COUNCIL adopted a "Resolution on Recommendations to the Federal Aviation Administration on Aircraft Noise Abatement at Washington National Airport" on July 13, 1977, following a series of public meetings on the subject held in cooperation with the FAA during May 1977; and

WHEREAS, both the documents referred to above provide an expression of policy developed through the region's citizens, its local and state governments, and its regional planning bodies concerning the existing and future role of the three airports serving the Washington Metropolitan Area--The Washington National Airport and the Dulles International Airport currently owned and operated by the FAA through its Metropolitan Washington Airports branch, and the Baltimore-Washington International Airport owned and operated by the State of Maryland through its Department of Transportation; and

WHEREAS, the U.S. Department of Transportation, Federal Aviation Administration (FAA) released a Proposed Metropolitan Washington Airport Policy and a Draft Environmental Impact Statement in support of the proposed Policy, both dated March 1978, for areawide review and comment; and

WHEREAS, based on the areawide review and comment, the FAA has revised its Proposed Metropolitan Washington Airport Policy through issuance of a Supplemental Draft Environmental Impact Statement and a Revised Proposed Policy, both dated January 1980, for areawide review and comment; and

WHEREAS, the Revised Proposed Policy, while an improvement in general concept and thrust, still differs from the region's expressed policy in two major respects as follows:

a. Region - Allow wide-body aircraft at National on a 1-for-2 basis. Reduce hourly air carrier operations by 50 percent (to 20 per hour) by 1985.

FAA - Allow wide-body aircraft at National and reduce hourly air carrier operations to 33 by 1990.

b. Region - Limit total growth at National to a target of 14 million annual total passengers, but not to exceed an ultimate growth of 16 million annual total passengers.

FAA - Allow growth at National to a ceiling of 18 million annual total passengers by 1985, with that level maintained thereafter; and

WHEREAS the Metropolitan Clearinghouse Review Comments of the COUNCIL on the Revised Proposed Policy and on the Supplemental Draft Environmental Impact Statement have been endorsed by the TPB, the Land Use Policy Committee, the Air Quality Planning Committee, and the Human Resources Policy Committee; and

WHEREAS, these Metropolitan Clearinghouse Review Comments raise a number of serious questions about the technical justification and rationale in support of the Revised Proposed Policy; and

WHEREAS, the Revised Proposed Policy still provides only minimal initial noise relief during the daytime hours due to a slight reduction in the airport's hourly quota of air carrier operations; and

WHEREAS, the Revised Proposed Policy does not adequately recognize recent and planned improvements in facilities and access at both Dulles and BWI; the under-utilization of these two airports while National is congested; and the concern that proposed expansion for National will create pressure for further growth and utilization of National at the expense of Dulles and BWI,

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NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS THAT:

1. While the COUNCIL supports the general concept and thrust of the Revised Proposed Policy and the urgent need for such a policy it takes strong exception to the proposed 18 million passenger limit and urges the FAA to adopt a 14 million passenger limit at National. Such a limit is both reasonable and achievable, and would be responsive to the region's major goals of accelerating and insuring the continuing reduction of aircraft noise impacts on local communities, and result in a more rational utilization of the three air carrier 1

airports serving the Washington Metropolitan Area.

2. The COUNCIL endorses the attached Metropolitan Clearinghouse Review Comments on the Revised Proposed Metropolitan Washington Airport Policy and on the Supplemental Draft Environmental Impact Statement in support of the Proposed Policy and urges the Federal Aviation Administration to revise the Policy and Statement to respond to the recommendations contained therein, including the following:

a. Phase in wide-body aircraft at National and adopt a firm schedule to reduce hourly air carrier operations by 50 percent (to 20 per hour) by 1985, thereby achieving a significant reduction in noise and other environmental impacts on the Washington Metropolitan Area.

b. Limit total passengers at National to 14 million annually, with an equitable distribution of flights above this limit to Dulles and BWI, thereby limiting the future environmental impact of National on the region, and providing a clearer policy for the orderly growth and development of all three of the region's air carrier airports. 2

c. Develop and implement the same kind of innovative and aggressive noise abatement program at National Airport as the FAA itself encourages at other airports in accordance with the U.S. Department of Transportation's Aviation Noise Abatement Policy of November 18, 1976. 3

d. Limit capital investment in improvements to terminal facilities and access roadways at National Airport to those which would improve the airport's operation, but would not sustain a level of activity beyond 14 million annual passengers.

e. Maintain the non-stop perimeter rule at National Airport to 650 miles, but without the seven cities that are currently served under the grandfather clause, i.e., Miami, Tampa, Orlando, West Palm Beach, Memphis, Minneapolis and St. Louis. 4

f. Address in greater detail the use of alternate transportation modes, particularly in the Northeast Corridor from Washington to Boston, as a means of limiting future growth and development at National Airport. 5

g. Develop the necessary regulations and penalties to assure that the proposed evening curfew at National Airport will be enforced, and work with the airlines to balance scheduling between 9 and 9:30 p.m. and eliminate "bunching" operations at 9:30 p.m. The number of scheduled slots at National between the hours of 9 p.m. and 9:30 p.m. be reduced to 18 with all arrivals and departures completed by 10:30 p.m. No operations other than emergencies be authorized between the hours of 10:30 p.m. and 7 a.m. 6

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h. Determine whether or not the physical modifications to National Airport implied by this Revised Proposed Policy would require an indirect source permit under provisions of Virginia State Indirect Source Regulations and amendments to the Clean Air Act of 1977, or would otherwise adversely impact on the attainment of clean air standards. 7

i. Implement the Administration's commitment to solving the serious regional noise and environmental problems related to the operation of the FAA's airports by applying the U.S. Department of Transportation's contracting, regulatory and financing authorities to increase the use of mass transit and common carrier service to the region's air carrier airports. 8

j. The FAA is strongly urged to expedite the construction of the Dulles Airport Access Road Connector in order to enable effective management of I-66. Further, FAA should consider promoting seriously the development of public transportation to other area airports. This should include a reevaluation of efforts designed to provide rapid transit to Dulles. 9

3. The COUNCIL notes that the FAA has indicated its willingness to participate in a Regional Aviation Advisory Group and that negotiations are under way. The COUNCIL urges early formation of such a Group as a continuing forum for addressing aviation policy issues facing the Washington Metropolitan Area.

Additional Comments from the
Council of Governments

Comment No.

1. Noise Modeling Process

It should be noted that the modeling process used to derive the NEF contours has certain limitations that result in contour configurations which do not totally reflect actual conditions. However, the state of the modeling art necessitates the use of certain standard assumptions in developing contours. Thus, the model assumes that all aircraft of any given type are equally noisy, and operated in the same manner, execute turns at precisely the same point. In reality, there is significant variability. Therefore, the contours in the EIS differ from contours generated using actual noise monitoring data. The model incorporates only aircraft-generated noise, whereas the levels recorded by the noise monitors incorporate other noise sources, as well. Actually, it is well-known that aircraft noise intrusions are not by any means confined to areas within the NEF contours. The major benefit of the contours is to assist in compatible land use planning. In the final EIS, the FAA should incorporate a discussion, and possibly an illustration, of the differences in contours derived from the modeling process versus those calculated using data from the monthly noise monitoring reports. 10

2. In the development of noise contours for Dulles, six Concorde operations daily are assumed in 1990. Since COG opposed the introduction of Concorde service at Dulles and in view of the fact that the noise levels associated with Concorde operations are a source of noise complaints at Dulles, it is recommended that the current level of operation not be increased in the future. 11

Ground Transportation Impact

1. National

The level of service analyses for roadways surrounding Washington National Airport indicates that Route 1 north of the Rte. 233 Viaduct will change from level of service E in the base case to A under the proposed 1990 policy. This results from the proposed development of I-595. It should be noted that, at the present time, the development of I-595 is questionable. Therefore, analysis of levels of service on airport access roads should be revised in the Final EIS without the assumption of I-595. South of the Route 233 Viaduct, the level of service changes from C to F due to increased volumes and roadway configurations. 12

On the George Washington Parkway, the primary access route to the airport, the level of service north of the airport changes from B to C. However, since the airport peak periods coincide with commuter peak periods, the projected level of service on the G.W. Parkway is questionable. This is particularly true in light of the fact that, on Route 1 south of the airport, level of service F will exist. It would appear that the overloading of Route 1 would divert more traffic to the G.W. Parkway than is assumed in the DEIS.

Comment No.

The DEIS assumes greater patronage on the Metrorail system but does not present the traffic impacts under the different scenarios tested.

Assumptions regarding the use of Metrorail should be documented, and a sensitivity analysis conducted as to the varying traffic volumes associated with each scenario.

2. Dulles International Airport

The FAA is strongly urged to expedite the construction of the Dulles Airport Access Road Connector in order to enable effective management of I-66. Further, FAA should consider promoting seriously the development of public transportation to other area airports. This should include a re-evaluation of efforts designed to provide rapid transit to Dulles. 13

Air Quality Impact

The Air Quality Impacts discussion presents the impacts likely to occur from this proposed policy using, where appropriate, pertinent existing condition information from the March 1978 Draft EIS.

The analysis of base and forecast data was calculated by dispersion modeling. The results are subject to some question because:

1) Such modeled data are useful for nonreactive gaseous pollutants (CO and SO_2) but only to the extent that the results can be compared to properly operated array of monitors;

2) In the case of THC and NO_x, these highly reactive gases cannot be modeled by simplistic means; and

3) In the case of TSP at an airport site with large parking apron and runways, the modeled results which do not account for fugitive or localized dust emissions would be questionable. In general, the air quality impact demonstration is lacking seriously in credibility. 14

A recommended and more useful approach would be a fully detailed emissions analysis which would not have the shortcomings of the diffusion modeling analysis used in the EPA report (EPA-450/4-79-012) and can be applied to CO, NO_x and nonmethane HC emissions as well. In addition and a minimum, the Final EIS, using emissions as a surrogate for air quality, should quantify the potential pollutant emission impact of:

1) The daily total CO, NO_x and nonmethane HC emission in taxi-idle mode, both current 1980 and for the forecasted 18 million total annual air passenger limit with time of day differences; and

Comment No.

2) Daily measured and estimated VMT within the airport boundaries on each of 7 days of a summer week, metrorail utilization, average vehicle speed within the airport and number of vehicle hours in idle mode at principal loading points.

Energy Impact

It is not possible to evaluate with present information the overall net energy impacts of the policy alternatives included in the Supplemental DRAFT EIS. Energy consumption associated with the air transport industry, however, can be thought of as segmented into the following categories:

1) Energy consumed at buildings and other fixed facilities at the three airports. 15

2) Aircraft fuel consumed during delays on the field due to congestion.

3) Fuel consumed by passenger vehicles carrying persons to and from the three airports.

Energy Consumed Due To Aircraft Delay

Capacity at Dulles and BWI has been deemed adequate to absorb foreseeable "overflow" traffic that might be diverted from National; therefore, the draft EIS focuses on National Airport itself. The SDEIS concludes that energy lost during peak IFR conditions is slightly less for the proposed FAA policy than for either the Expanded Growth or Restricted Growth scenarios. No analysis is presented to support this assumption. 16

In summary, the energy impacts of any of the policy options would appear to be minor. However, additional analysis should be included in the Final EIS to support the assumptions described above. 17

Economic Impacts

The final EIS should contain an analysis of the economic impacts of the proposed policy and its alternatives on the metropolitan areas impacted by National, Dulles and BWI. 18

State and Regional Government

Metropolitan Washington Council of Governments

Response 1 - The FEIS provides an environmental assessment of a range of policy options including the alternative recommended by the Council of Governments. The Department of Transportation will select a policy for Metropolitan Washington Airports from within the range of these options. The policy selected will reflect a balance of the complex competing interests that influence the two Federal airports, including the concerns of the local governments in the Washington area about aircraft noise impacts.

Response 2 - See Response Number 1 above.

Response 3 - This policy effort for Metropolitan Washington Airports and the cooperative study effort between FAA and COG concerning the evaluation and testing of alternative flight procedures from National Airport responds to the guidance provided in the U.S. Department of Transportation's Aviation Noise Abatement Policy of November 18, 1976.

Response 4 - See Response Number 1 above.

Response 5 - See pages 291 through 306 of the Draft Environmental Impact Statement for an MWA Policy dated March 1978.

Response 6 - See Response Number 1 above. It is anticipated that the MWA Policy will be enacted as a Federal regulation.

Response 7 - See Response Number 1 above. The FEIS provides an air quality assessment for the policy options under consideration. None of these options would result in a requirement for an Indirect Source Permit under Virginia State Regulations. An indirect source permit is not required for the modification of an airport that results in an increase in aircraft operations of less than 50,000 per year by regularly scheduled air carriers over existing aircraft operations or an increase of less than 1,600,000 passengers per year. These increases are applied within a ten year period of construction or modification. None of the policy options would result in these thresholds being exceeded.

Response 8 - The MWA Policy will define a role for each of the two Federal airports. Necessary access improvements will be made to assure the airports fulfill their designated roles.

Response 9 - FAA is moving as rapidly as possible to complete the Dulles Airport Access Road Connector. See Response Number 8 above.

Response 10 - Although the output from the Metropolitan Washington Airports Aircraft Noise Monitoring System does not produce contours, it does produce cumulative noise levels at each of the monitoring sites for Day/Night Average Sound Level (Ldn). The Ldn levels derived from the noise model for the existing conditions

(1979) were compared to the output from the aircraft noise monitoring system. The monitoring data, together with the latest aircraft data, were used to fine tune the noise model to reflect actual field conditions. There was a close correlation between measured Ldn levels and the output from the model for locations close to the airport and along the river flight paths at National (within 1 or 2 Ldn units). The major benefit of noise contours are to measure relative differences between policy alternatives and to assist in land use planning. See the noise section of the FEIS for National concerning the use of noise contours.

Response 11 - The six Concorde operations were included based on a forecast of possible future demand. This level of operations remained constant for all policy alternatives and should not be considered as part of the MWA Policy effort. Concorde service at Dulles was the subject of a separate decision making process and Environmental Impact Statement in 1978.

Response 12 - Route 1 Level of Service: The Route 1 corridor has been re-evaluated in light of the cancellation of the I-595 project. The latest proposed improvement plan, known as Alternative D-1, and future traffic loadings have been received from Virginia Department of Highways and Transportation (VDHT) and incorporated into the EIS analysis. The proposed improvements indicate that the specific links of Route 1 assessed in the EIS should operate at satisfactory levels of service in 1990 under all of the policy alternatives.

George Washington Parkway Level of Service: The analysis of projected traffic volumes, both airport and non-airport, indicates that the probable level of service on the George Washington Parkway north and south of the airport will be LOS "C" or better. The COG assumption that Route 1 south of the airport would be at LOS "F" in 1990 can not be validated by examination of the available data provided by VDHT and their consultants. The analysis of George Washington Parkway traffic flows assumes that the peak enplane/departure period of National occurs in the George Washington Parkway's peak PM hour. This assumption is made for the purposes of a "worst case" analysis, even though the actual peak hour of National passenger activity occurs in the 6-7 PM hour, while the recorded PM peak hour of the Parkway historically occurs in the 4-6 PM time frame.

Metro Rail Patronage: Metro Rail Patronage assumptions are based upon the available data from COG Metro surveys and planning projections made by consultants for the FAA. The projected minor increase in Metro usage from an existing 1979 mode split rate of 15 percent to a future 1990 rate of 20 percent is deemed to be reasonable and consistent with published reports.

Response 13 - FAA is moving as rapidly as possible to construct the Dulles Airport Access Road Connector. The MWA Policy will define a role for Dulles Airport. Necessary access will be provided to fulfill the role designated by the MWA Policy effort.

Response 14 - The Final Environmental Impact Statement (FEIS) utilizes modeling to simulate airport-related concentrations for 1979 and 1990. The modeled data was not compared to ambient data as extensive monitoring information was not available at the selected receptor locations. Therefore, calibration of the AVAP projections was not performed.

The modeling procedure for nonreactive gaseous pollutants (CO and SO_2) is more valid than for the highly reactive pollutants, THC and NO_x, as these pollutants have a short lifetime expectancy. The reactive pollutants can be modeled on a short-term/short-transport distance basis but not without special treatment of the chemical reactions involved.

Total suspended particulates (TSP) were modeled at each receptor, but a fugitive dust analysis was not included as on-airport TSP data was unavailable for calibration purposes.

It is expected that fugitive dust emissions would be significant only during construction activities. The principal components of the airfield, such as the runways and apron areas, at each of the airports are built. The Airport Policy does not involve airfield expansion at any airport, therefore, fugitive dust analysis have not been considered.

An emission inventory was prepared for the existing condition and for each of the alternatives at National, Dulles and Baltimore-Washington Airports for inclusion in the FEIS. Included in the inventory was an analysis of aircraft emissions per landing-takeoff cycle (LTO) for carbon monoxide (CO), hydrocarbons (HC), oxides of nitrogen (NO_x), total suspended particulates (TSP) and sulfur oxides (SO_x). The LTO emission factors account for substantial emissions during the taxi-idle mode as defined in APTD 1470.[1]

The impact of vehicular traffic upon the emission inventory was predicted utilizing estimated VMT within the Washington-Baltimore region generated by each airport. These estimates were compiled using the mode split characteristics defined in the Surface Access section of this report.

For the dispersion analysis, vehicle speeds of 10 mph and 25 mph were used for various on-airport roadways. The number of vehicle hours in the idle mode was not developed in this study, due to the effect of curbside enforcement strategies on this parameter.

Response 15 - The final EIS provides data in the form requested. Energy conserved at the facilities (predominantly electrical power), aircraft related fuel usage (within the landing/taxi-idle/takeoff modes) and regional effects by alternative of passenger/

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[1]An Air Pollution Impact Methodology For Airports - Phase I (APTD - 1470), January 1973.

meeter greeters, etc., to and from each of the three airports has been estimated. The information on aircraft emissions is provided in the FEIS by airport and regional surface vehicle emissions by alternative. See Energy subsection at National Airport in FEIS.

Response 16 - The energy information has been revised in the Final EIS for each of the policy alternatives now under consideration. The amount of energy consumed in 1990 by aircraft at National results from two key factors including: the number of air carrier type aircraft; and the mix of large and small aircraft. Clearly the more air carrier size aircraft; the more pollutant emissions that could be expected. However, the mix of very large and very small aircraft requires more separation between operations. In addition, the wide body aircraft generate higher pollutant loads than all other types of aircraft. The levels of energy consumption should be viewed in this light.

Response 17 - See Response Numbers 15 and 16.

Response 18 - Issues regarding economic concerns are included in the FEIS and will be detailed more directly in the decision making document for an MWA Policy.

Comments from The Government of The District of Columbia

Comment No.

Recommended Position of OPD

Based on a transportation position, I recommend we endorse DOT's Proposed Policy. This policy allows for controlled growth and management of the airport over the next ten (10) years. It will allow for more modern facilities to be built at National, a reduction in air and noise pollution, and it would allow for an increase in commuter airline service. These measures would maintain the character of National Airport as a mid-range air facility and more evenly distribute air traffic to the other main airports, Dulles and BWI.

Specifically, I recommend the following policy:

- Set limit on growth at National Airport at 16 to 18 million. 1
- Give FAA authority to allow wide body jets to land at National.
- Reduce number of carrier flights (slots) into airport from current 42 to 36, increase number of commuter flights from 8 to 12 per hour.
- Change non-stop flying limit from 896 to 1,000 miles.

However, it should be noted that this recommended policy does not take into consideration the economic impact such growth limitations will have on the city. The economic concerns that arise from the FAA Proposed Policy are outlined below and should be directed to the FAA when we comment on the DEIS.

1. The limit of 16 million annual passengers at National Airport has been stressed consistently by D.C. and the region. The DEIS acknowledges it to be in the interest of noise reduction. Growth to 18 million will represent a 20 percent passenger increase over present volumes and require major renovation to existing ground side facilities. The increase also does not recognize the increasing competitiveness of rail service in the Northeast corridor that will ensue from Amtrack improvements planned for that mode. U.S. DOT should consider phasing out flights and extra sections to cities in the Northeast corridor except at premium fares. 16 million has not been demonstrated as an interior passenger limitation nor has 18 million been shown to be in the best environmental interest of the region. 2

2. It is clear that the use of wide body aircraft can both reduce instant noise levels as well as aircraft traffic. Assuming that the airport can accommodate these aircraft, FAA policy should encourage the use of wide body aircraft. 3

3. In the interest of noise abatement during sensitive hours, 4

Comment No.

airport closure at 10:00 p.m. rather than 10:30 p.m. would be beneficial.

4. No examination was given to the District's earlier recommendation to adjust take-off procedures as a noise reduction measure. (Correspondence attached.) This recommendation should be addressed. 5

5. The proposed policy retains a somewhat open-ended approach to the number of shuttle extra-sections. This may be counter-productive from a noise standpoint. 6

6. No mention is made of either the impact of completely closing National or of a rail rapid transit connector to Dulles International Airport. 7

Government of the District of Columbia

Office Planning and Development

Response 1 - The FEIS provides an assessment of a range of policy options. The MWA Policy will balance the complex combination of competing interests that influence the two Federal airports. Issues regarding economic concerns are included in the FEIS and will be detailed more directly in the decision making document for an MWA Policy.

Office Transportation Policies and Plans

Response 2 - See Response Number 1 above. One of the options under consideration includes a 16 million annual passenger ceiling at National. In regard to rail service in the Northeast corridor, see pages 291 through 306 of the Draft Environmental Impact Statement for an MWA Policy, dated March 1978. The Department of Transportation has neither the desire nor the authority to phase out airline flights to the Nation's Capital or directly control the fares the airlines charge.

Response 3 - Two- and three-engine wide body aircraft at National are contained in some of the policy options under consideration by the Department of Transportation.

Response 4 - The policy options in the FEIS contain various operating curfew configurations at National. However, a curfew as opposed to a scheduling cut off earlier than 10:30 p.m. would be too disruptive to air service at National while providing only a small measure of noise benefit.

Response 5 - See footnote on page III-9 of the Supplement to the DEIS dated January 1980 for the MWA Policy Proposal. Adjustments to flight procedures for noise abatement purposes are being considered under a separate FAA and Metropolitan Washington Council of Governments joint study program.

Response 6 - The policy options in the FEIS contain various recommendations concerning extra-sections. It should be noted that the policy alternatives that include a passenger ceiling, Controlled Growth Alternatives, also control air carrier operations. Essentially, the passengers on extra sections would be included in the total to be applied against the ceiling. The total number of air carrier operations would be the same with or without extra sections.

Response 7 - The closing of National is not considered a reasonable alternative given the necessity for three major air carrier airports in the Washington-Baltimore region. Such an alternative would not be consistent with the responsibility of the Department of Transportation to accommodate the air transportation needs of the Nation's Capital. The median of the Dulles Access Highway has been reserved for use by rapid rail to Dulles. The MWA Policy will establish a regional role for Dulles and access will be added to fit this role.

MARYLAND
DEPARTMENT OF STATE PLANNING
301 W. PRESTON STREET
BALTIMORE, MARYLAND 21201

HARRY HUGHES
GOVERNOR

CONSTANCE LIEDER
SECRETARY

March 21, 1980

Mr. James A. Wilding, Director
Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport, Hangar 9
Washington, D.C. 20001

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT (EIS) REVIEW

Applicant: U.S. Department of Transportation - Federal Aviation Administration

Project: Supplement to the Draft EIS Regarding the Metropolitan Washington Airports Policy

State Clearinghouse Control Number: 80-1-744

State Clearinghouse Contact: James McConnaughhay (383-2467)

Dear Mr. Wilding:

The State Clearinghouse has reviewed the above project. In accordance with the procedures established by the Office of Management and Budget Circular A-95, the State Clearinghouse received comments from the following:

Department of Natural Resources, Department of Economic and Community Development including their Historical Trust section and the Environmental Health Administration noted that the statement appears to adequately cover those areas of interest to their agencies.

Department of Transportation presented detailed (copy attached) comments supporting their position that a 16 million annual passenger cap at Washington National Airport would better serve the goal to achieve a balanced utilization of the three airport system serving metropolitan Washington and that a 10:00 P.M. curfew and a 7:00 AM to 9:30 PM airline scheduling limitation, the Washington National Airport would adequately mitigate the burdensome night time noise levels on nearby residents.

National Capital Planning Commission, Metropolitan Washington Council of Governments and the Baltimore Regional Planning Council are involved with conducting the regional and local reviews on the statement and should respond directly to the applicant within the prescribed time period allowed for review.

TELEPHONE: 301-383-2467
OFFICE OF STATE CLEARINGHOUSE

Our staff review concurred with the Department of Transportation recommendations regarding the operating curfew and scheduling limitation and indicated that the draft EIS Supplement should note the major expansion and improvements that have occurred at the Baltimore-Washington International Airport. These improvements allow BWI to handle more aircraft at the present time which can aid in reducing noise and airspace capacity problems that currently plague Washington National.

We hope this review is helpful to your agency in the continuing evaluation of this project and anticipate that the concerns presented in the review will be properly considered and documented in the Final EIS. Thank you for your attention to the A-95 review process.

Sincerely,

James W. McConnaughhay
Director, State Clearinghouse

cc: Lowell Frederick
Clyde Pyers
Henry Silbermann
Max Eisenberg
Walter Scheiber
Reginald Griffith
Nadine Jones

JMc:BG:pw

Maryland Department of State Planning
State Office Building
301 West Preston Street
Baltimore, Maryland 21201

Date: March 17, 1980

DEPT. OF STATE PLANNING
RECEIVED
MAR 20 1980
REVIEWED | REPORT
ANSWERED

SUBJECT: ENVIRONMENTAL IMPACT STATEMENT OR ENVIRONMENTAL EFFECTS REPORT

Applicant: U.S. Dept. of Transportation - FAA

Project: Draft EIS - Metropolitan Washington Airports Policy

State Clearinghouse Control Number: 80-1-744

We have reviewed the above draft environmental impact statement and our comments as to the adequacy of treatment of physical, ecological, and sociological effects of concern are shown below:

	Check (X) for each item	
	None	Comment enclosed
1. Additional specific effects which should be assessed:	XX	
2. Additional alternatives which should be considered:	XX	
3. Better or more appropriate measures and standards which should be used to evaluate environmental effects:		XX
4. Additional control measures which should be applied to reduce adverse environmental effects or to avoid or minimize the irreversible of irretrievable commitment of resources:	XX	
5. Assessment of seriousness of the environmental damage from this project, using the best alternative and control meausres:	XX	
6. Activities which appear to be inconsistent with the State approved Coastal Zone Management Program.	XX	
7. Issues which require further discussion of resolution as shown:	XX	

Signature [signature]

Title Director, Office of Transportation Planning

Agency Md. Department of Transportation

Address

Comments from the State of Maryland | Comment No.

The Maryland Department of Transportation finds the Federal Aviation Administration's Proposed Metropolitan Washington Airports Policy and concomitant Supplement to the Draft Environmental Impact Statement (DEIS) generally consistent with its plans, programs and objectives. 1

- Passenger Cap

The Maryland Department of Transportation and its Aviation System Plan support COG Recommendations No. 2 and 3 (Preferred Alternative 1980 to 1985 and 1985 to 1995, respectively) for Washington National Airport, as stated in the 1975 policy document and reaffirmed by the 1978 Supplementary Report. These two recommendations establish an eight million enplanement (16 million passenger) limit at National Airport with diversion of flights from Washington National to BWI and Dulles International (IAD). This 16 million passenger cap has been widely endorsed and is virtually a unanimous position of local governments and affected agencies. The Department urges that the proposed policy recognize this regionally accepted figure and adopt a 16 million passenger cap for Washington National. 2

Current scheduling practices and operational realities clearly suggest that airlines operating out of Washington National will cluster their final 18 schedules just prior to the 9:30 p.m. cessation of operations, thereby potentially extending operations up to the 10:30 p.m. curfew. The proposed scheduling scheme offers inadequate relief to Maryland residents burdened with night time noise levels associated with the final, daily surge of National Airport operations. 3

The State of Maryland

Response 1 - No response necessary.

Response 2 - The FEIS provides an environmental assessment of a range of policy options, including an option based on a 16 million passenger cap at National.

Response 3 - The FEIS provides an environmental assessment of a range of policy options. The elements within some of these options contain various scheduling and curfew provisions. The Controlled Growth and Reduced Activity alternatives would significantly reduce noise impacts during the nighttime hours. See the noise section for National concerning the rollback of airline schedules to 9:30 p.m. and the operating curfew.

COMMONWEALTH of VIRGINIA

Council on the Environment

J. B. JACKSON, JR
ADMINISTRATOR

903 NINTH STREET OFFICE BUILDING
RICHMOND 23219
804-786-4500

April 17, 1980

Mr. James A. Wilding, Director
Metropolitan Washington Airports
Washington National Airport, Hangar 9
Washington, D. C. 20001

Comment No.

Dear Mr. Wilding:

The Commonwealth has completed its review of the Supplement to the Draft Environmental Impact Statement on Metropolitan Washington Airports Policy. The Council on the Environment is responsible for coordinating the State's review of environmental impact statements and responding to appropriate federal officials on behalf of the Commonwealth. The following state agencies took part in the review of this document:

State Air Pollution Control Board
State Office of Emergency and Energy Services
Office of Transportation
Department of Aviation

While the proposed policy is generally consistent with the Virginia Department of Aviation objectives, the Commonwealth has a number of concerns relating to the Supplement. One is that the document failed to accomplish the rigorous exploration of all reasonable alternatives that is at the heart of the process mandated by the National Environmental Policy Act. Other concerns are reflected in the detailed comments (attached) of individual reviewing agencies. 1

The Commonwealth agrees that it is important to define an appropriate relationship between the Washington area airports in order to address growing public concern over congestion, noise, and safety problems at National Airport and to make better use of the untapped capabilities of Dulles Airport. Making better use of Dulles will require that mass transit to Dulles from Washington and the inner suburbs be greatly expanded in the interests of energy conservation, air quality maintenance, and traffic control. In addition, the provision of emergency services for accidents at Dulles should be addressed. 2

National Airport is at or near the limit of its capacity. Any increase in its traffic would tend to raise ozone and carbon monoxide levels in the Northern Virginia suburban area and thus risk violating the State Implementation Plan. Policy elements in the Supplement fail to provide alternatives to further growth. One element in the proposed policy called for evaluation of a 1000-mile perimeter, for example; the Commonwealth prefers that the 650-mile perimeter be retained and the "grandfather" cities deprived of their present exemption in the interest of reduced takeoff weight, less noise, and fewer operations at National. 3

Specific comments of the reviewing agencies are appended for your further consideration. Thank you for the opportunity to review this document.

Sincerely,

Kuth J Buttleman

(for J. B. Jackson, Jr.)

JBJr/CHE:gcj
Enclosures
cc: The Honorable Maurice B. Rowe, Secretary of Commerce and Resources
Mr. George Jones, State Office of Emergency and Energy Services
Mr. John M. Daniel, Jr., State Air Pollution Control Board
Mr. Hiram R. Johnson, Office of Transportation
Mr. Ted Alman, Department of Aviation

E. FOLCER TAYLOR, CHAIRMAN
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YORKTOWN

CARL C. REDINGER
ALEXANDRIA

COMMONWEALTH of VIRGINIA

State Air Pollution Control Board

ROOM 1108, NINTH STREET OFFICE BUILDING
RICHMOND, VIRGINIA 23219
TELEPHONE: (804) 786-2378

W. R. MEYER
EXECUTIVE DIRECTOR

April 4, 1980

APR 1980
Council on the Environment

Mr. Charles H. Ellis
Environmental Impact Statement Coordinator
Countil on The Environment
903 Ninth Street Office Building
Richmond, VA 23219

Comment No.

Dear Mr. Ellis:

After reviewing the Metropolitan Washington Airport Policy Supplement it is apparent that no perfect solutions exist. To increase the congestion at National by increasing their capacity could only worsen the air pollution in that area. However, to force people to drive more miles out to Dulles is not only counter productive to the goals of this agency but would also consume more energy. It would seem that the negative aspects of increasing operations at National outweigh those of redirecting people to Dulles.

As you are aware the Northern Virginia area does not attain the ozone or carbon monoxide standard. At this time, any policy which adds to the ozone or carbon monoxide pollutant burden in that area, above what is expected under normal growth conditions, is not consistent with nor does it conform with the goals and objectives of Virginia's State Implementation Plan. 4

The proposed policy does not appear to accelerate growth but rather shift it from National to Dulles and the Baltimore - Washington airports. Increased emissions related to additional miles traveled could be offset if adequate mass transportation is provided.

Sincerely

John M. Daniel, Jr.
Assistant Executive Director

JMDJr/WPP/nkv

cc: Region VII, Hank Hughes, Sam Helms

"An Equal Opportunity Employer"

COMMISSIONER
BRISTOL, BRISTOL DISTRICT
ROANOKE, SALEM DISTRICT
DANVILLE, LYNCHBURG DISTRICT
RICHMOND, RICHMOND DISTRICT
YORKTOWN, SUFFOLK DISTRICT
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SPRINGFIELD, CULPEPER DISTRICT
STAUNTON, STAUNTON DISTRICT
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CROWE, AT LARGE-RURAL

LEO E. BUSSER, III
DEPUTY COMMISSIONER & CHIEF ENGINEER
J. T. WARREN
DIRECTOR OF ADMINISTRATION
J. M. WRAY, JR.
DIRECTOR OF OPERATIONS
H. R. PERKINSON, JR.
DIRECTOR OF PROGRAM MANAGEMENT
W. L. BRITTLE, JR.
DIRECTOR OF ENGINEERING
OSCAR K. MABRY
DIRECTOR OF PLANNING

IN REPLY PLEASE REFER TO

COMMONWEALTH of VIRGINIA
DEPARTMENT OF HIGHWAYS & TRANSPORTATION
1221 EAST BROAD STREET
RICHMOND, 23219

Y
TAL QUALITY ENGINEER

April 30, 1980

FAA Draft Environmental Impact
Statement Supplement on
Metropolitan Washington Airports

MAY 1980
Council on the Environment

Mr. Charles Ellis
EIS Coordinator
Council on the Environment
Ninth Street Office Building
Richmond, Virginia 23219

Dear Mr. Ellis:

Thank you for providing us with an opportunity to review the subject document. We concur with the procedures of the proposed policy in the report, as it seems to produce less impact with the gradual transition of airport functions. In addition, we concur with the attached Draft Metropolitan Washington Council of Government's (TPB/COG) comments pertaining to the Ground Transportation Impact, page 8. Comment No.

It was noted that the report's proposed policy will impact the roadway systems surrounding both National and Dulles Airports. By the year 1990, Route 28 (Sully Road) in the Dulles Airport vicinity is anticipated to operate at level of service F, assuming that the roadway is not widened prior to 1990. 5a

The Route 1 (Jefferson Davis Highway) corridor in the vicinity of National Airport may not be constructed as originally proposed. Therefore, a level of service A, as indicated in the report for this section of roadway (Table III-5), may not be achieved. A much lower level of service, C or D, may be more realistic here. 5

METRO may not be able to adequately serve many of the major employment/commercial centers, particularly in the Dulles area. Further consideration should be given to a satellite parking and shuttle program offering additional passenger service to these centers in order to relieve the expected traffic congestion around Dulles. 6

Sincerely,

R. L. Hundley
Environmental Quality Engineer

8. REVIEW INSTRUCTIONS:

A) Please review the document carefully. If the proposal has been reviewed earlier (e.g., if the current document is a FINAL EIS), please consider previous comments.

B) Prepare your agency's comments in a form which would be acceptable for responding directly to a project sponsoring agency.

C) Use the space below for your comments. If additional space is needed, please attach extra sheets.

Return your comments to:

Charles H. Ellis III
Environmental Impact Statement Coordinator
Council on the Environment
903 Ninth Street Office Building
Richmond, Virginia 23219

Charles H. Ellis III

CHARLES H. ELLIS III
ENVIRONMENTAL IMPACT STATEMENT COORDINATOR

COMMENTS

Comment No.

This agency has reviewed subject document primarily from an emergency services standpoint, namely the additional burden that could be placed on jurisdictions in close proximity to both Dulles International and Washington National Airports due to the increased probability of a serious aircraft accident resulting from additional traffic brought about by the proposed policies. While the emergency services area is not addressed in this EIS, it must be considered, especially in view of the increase in traffic at Dulles International under the restricted-growth alternative, which is considered the most logical. The increase in traffic definitely increases the probability of an accident involving aircraft during departures and arrivals; however, the fact that Dulles International is situated in a largely rural area and occupies a vast amount of land, it does not appear that an additional burden for emergency services would be placed on local jurisdictions. A general review of energy consumption resulting from the restricted-growth alternative indicates that while surface traffic consumption would increase somewhat, it could be reduced considerably by a continued effort toward developing a mass transit system from Dulles International to the downtown and suburban Washington areas. 7

(SIGNED) George L. Jones

(TITLE) State Coordinator

(AGENCY) State Office of Emergency and Energy Services

BEFORE THE
U. S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
WASHINGTON, D. C. 20591

NOTICE OF PROPOSED RULEMAKING 80-2 Docket No. 19948

NOTICE OF PROPOSED POLICY Docket No. 19950

COMMENTS OF DEPARTMENT OF AVIATION

COMMONWEALTH OF VIRGINIA

Comment No.

On January 15, 1980, the U. S. Department of Transportation and the Federal Aviation Administration (FAA) issued two documents. The first was a Notice of Proposed Policy (NPP) to guide the future operation and development of Washington's two airports (Docket 19950). The second was a Notice of Proposed Rulemaking (NPRM) to implement the policy changes on January 1, 1981 (Docket 19948). The Department of Aviation is submitting these comments on just the NPRM. They are in addition to our oral testimony presented at the Public Hearing held at Washington/Dulles International Airport on March 25, 1980 (copy attached).

The FAA has proposed a 9:30 P.M. to 7:00 A.M. curfew on Washington National Airport for all scheduled operations (14 CFR 159.40). The Department 8

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suggests that the FAA shorten the proposed curfew for commuter carriers so that it would extend from 10:30 P.M. to 6:00 A.M. We suggest that commuter carriers should be able to schedule operations at one-half the hourly allocation proposed in Alternative B (8 per hour - 14 CFR93.123) during the period from 6:00 A.M. to 6:30 A.M., then from 6:30 A.M. to 7:00 A.M., commuter carriers would be able to schedule operations at the proposed rate of 15 per hour. No air carrier or general aviation operations would be permitted before 7:00 A.M. In the evening, commuter carriers should be able to schedule operations at the rate of 15 per hour from 9:00 P.M. to 10:00 P.M. Between 10:00 P.M. and 10:30 P.M., commuter operations would be reduced to the rate of 8 per hour. Again, no air carrier or general aviation operations except for unscheduled emergencies allowed after 9:30 P.M. 8

Such a modification in the proposed policy should have minimal environmental impact in that operations will be conducted by aircraft which in general have noise and pollution characteristics significantly less than the majority of present generation jet aircraft. In addition, since the vast majority of commuter passengers are connecting either to or from air carrier flights and since there is a 45 minute "legal" connect time at Washington National for the construction of connecting flights, such a provision in the policy will have a minimal effect on either the land or air side congestion and the resulting pollution levels at National either before 7:00 A.M. or after 9:30 P.M. and should actually help to relieve congestion and reduce pollution levels in the 7:00 A.M. to 8:00 A.M. period and again in the 9:00 P.M. to 9:30 P.M. period.

The Department believes that the FAA is under extreme pressure to adopt a uniform perimeter rule of 1,000 miles. While the Department is opposed to a 1,000 mile rule and reiterates its position favoring a 650 mile rule without the current "grandfather" exemptions, it suggests a method of protecting the short and medium haul role of National Airport, but will also allow limited long haul service.

The Department believes that the FAA should adopt a weighted slot allocation formula based on a multi-perimeter rule for air carriers according to the following table.

Perimeter (Miles)	Scheduled IFR Operations per Hour
0 - 400	20
401 - 700	10
701 - 1,000	6

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Such a policy would have many desirable effects. It would mean that over 73% of all IFR operations (44 per hour) would be in short haul markets, almost 17% (10 per hour) would be in medium haul markets, and only 10% (6 per hour) concentrated in long haul markets.[1/] It would protect and enhance the role of Washington-National as primarily a short and medium haul airport, but would allow limited non-stop service to several communities within 1,000 miles which have been "unjustly" denied service in the past. It would also protect service in short haul markets which are extremely dependent on service to National for both connecting service and direct service to the most convenient destination airport for downtown Washington, D. C. Further, it would help to limit growth at National to the 18,000,000 passenger ceiling proposed in the policy (Notice of Proposed Policy, Docket 19950). Finally, because of the concentration of service in short haul markets, it would have a beneficial impact on noise and pollution levels both at National and in the surrounding communities. This is due to the fact that the greatest concentration of operations would be conducted by aircraft characteristically producing low noise and air pollution levels.

The Department also suggests that commuter carriers should be prohibited from operating more than 300 miles non-stop from Washington National. Ultimately, with National Airport operating at fixed capacity both in terms of

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1/ Commuter and general aviation operations are counted as short-haul operations.

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operations and passengers, longer haul commuter traffic should be fed through a convenient hub with frequent, direct service to Washington. Such a prohibition will help to produce a greater balance in our Air Transportation System in terms of the best use of the capacity limitations at National Airport. 10

THEREFORE, the Department of Aviation of the Commonwealth of Virginia urges the Federal Aviation Administration to include in Title 14 of the Code of Federal Regulations rules which will allow scheduled commuter operations prior to and subsequent to the curfew proposed in the Notice of Proposed Rulemaking. Further, the Department urges the FAA to adopt a multi-perimeter rule and concurrently allocate slots on a weighted basis to further protect and enhance the role of Washington National Airport as primarily a short and medium haul airport.

COMMONWEALTH of VIRGINIA

G. PLENTL

Department of Aviation
4508 South Laburnum Avenue

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(804) 786-3685

Statement of the Virginia Department of Aviation on the Proposed Policy for the Operation of the Metropolitan Washington Airports.

Mr. Chairman, we would like to thank you for this opportunity to offer our comments on the recently published Supplement to the Draft Environmental Impact Statement (D.E.I.S.) of March, 1978. We praise the Metropolitan Washington Airports Division of the Federal Aviation Administration for the comprehensive document which has evolved. Its publication has come at a time when issues like air transportation, land use planning, energy, and environmental concerns are critical to the future development of the Northern Virginia Region.

It is because of the potential catalytic effects from this policy that we have carefully reviewed the document and have the following comments to offer:

A) The Department believes that the FAA's proposal to reduce Air Carrier operations to 36 per hour, raise commuter operations to 15 per hour, and lower General Aviation operations to 9 per hour offers a realistic method of controlling passenger growth at National Airport. Increased commuter access will also alleviate the disparity between the demand for and the availability of commuter slots.

B) The FAA;s proposal to place a 9:30 PM to 7:00 AM curfew on National for air carrier and commuter operations is perhaps the best method available to both control passenger growth and improve the environment around National Airport. If passenger growth is carefully monitored in the future, the operating curfew can be expanded as wide bodied aircraft are introduced and Air Carrier operations are further reduced.

C) The Department is extremely concerned about the implication of a 1,000 mile perimeter rule. Today, the average stage length of trunk carriers such as United and Eastern is only slightly more than 650 miles. A 1,000 mile rule will mean that National will become a facility offering all levels of air line service rather than its desired role as a medium and short-haul facility. Further, the SDEIS does not include a comparison between the noise and pollution levels of similar aircraft operating a 150 mile stage length versus a 1,000 mile stage length. Obviously, a comparison would have shown higher noise and pollution levels for at least 50% of the operations involving the longer stage length flights. We also believe that the only way to adequately encourage the greater use of Washington's other airport is to discontinue the exemptions granted to the seven "grandfather" cities. Therefore, the Department believes that the FAA should formally adopt a 650 mile perimeter rule at National without the current exemptions. 11

Comment No

D) The Department believes that the final ceiling on passenger growth at National should never exceed 18,000,000 passengers. Therefore, if that ceiling has not been reached by 1985, passenger growth should not be allowed to grow to meet the ceiling, but should remain at the 1985 level. 12

E) One of the key elements of the FAA Proposed Policy is to shift a significant amount of the current air carrier activity at National Airport to Dulles International. In the past, much of the lack of activity at Dulles International has been attributed to poor surface access and the resultant public decision when given the choice, to use National instead of Dulles International Airport

We cannot overemphasize the need to rectify this situation, for without a solution, the Proposed Policy will be meaningless rhetoric. One of the prime solutions to the access problem is the rapid completion of the Dulles Access Road Extension and Interstate 66. Although this point is covered on Page III-36 of the supplement, its potential impact on the increased utilization of Dulles International cannot be overstated. The direct link with Interstate 66 will greatly expand the ground service area of the airport and provide for the accessability from the Washington, D.C. area so critically needed to make this policy work. 13

The revised November, 1981 completion date of the Dulles Access Road Extension and Interstate 66 by the Virginia Department of Highways and Transportation must

be afforded one of the highest priorities in whatever policy is adopted.

F) The issue of increased General Aviation utilization at Dulles International is one that we have been closely involved with for the past five years.

The Virginia Air Transportation System Plan published in August 1975 recognized the need for two additional General Aviation Airports in Northern Virginia to be operational by 1990. However, due to financial, environmental, and land use constraints it is highly unlikely those facilities will ever be constructed. In addition, there is the distinct possibility that several privately owned, public use General Aviation Airports in the Metropolitan Washington area will cease to exist because of encroaching development. This leaves us with a peculiar problem; to provide adequate General Aviation capacity with a decrease in the number of airports.

It is because of this, that we again ask for development of a separate General Aviation facility on the Western side of the Dulles International site. The addition of a General Aviation runway, apron, hangars and terminal space would help to meet the urgent General Aviation needs of the region. If at such time in the future that this proposed General Aviation runway be required for air carrier use, it has only to be expanded. 14

The separate facilities will allow the segregation of slower General Aviation aircraft from the larger and faster Air Carrier types. This would allow Dulles

International to effectively absorb air carrier operations from National and still provide relief for the ever increasing General Aviation demand in Northern Virginia.

In conclusion, we would again like to thank you for this opportunity to offer our comments and praise your efforts in soliciting public input while developing a policy for planned aviation growth in the region.

Commonwealth of Virginia

Response 1 - The policy options presented in this FEIS were developed after consideration of public comment received from the circulation of a Draft Environmental Impact Statement in 1978 and a Supplement to that EIS in 1980. The Commonwealth of Virginia reviewed both of these documents and submitted comments. A total of 7 public hearings were held and approximately 1,500 comment letters were received. The 1978 DEIS considered 32 alternatives. These alternatives have been narrowed to what is contained in this FEIS. The Department of Transportation believes all reasonable alternatives have been considered as required by the National Environmental Policy Act.

Response 2 - The MWA Policy will balance a complex combination of competing interests that have influenced the two Federal airports, including local concerns about aircraft noise and a national concern regarding air service into the Nation's Capital. The Department is not aware of safety problems at National Airport. It is requested that the Commonwealth of Virgina specifically list the safety problems it believes inherent in the operation of Washington National Airport. The Department holds that safety as the first and most important consideration in the administration of the two Federal airports. The Department sees no purpose in listing the emergency services at Dulles in an environmental impact statement. However, should the Commonwealth desire a detailed listing of emergency services at both airports, it shall be provided.

Response 3 - The FEIS contains an environmental assessment of a range of policy options. The air quality impacts of these options are detailed in the FEIS. The option of a 650 mile perimeter at National is contained in a policy option (No Growth option) in the FEIS.

Response 4 - See Response Number 3.

Response 5 - Route 1 Level of Service: The Route 1 corridor has been re-evaluated in light of the cancellation of the I-595 project. The latest proposed improvement plan, known as Alternative D-1, and future traffic loadings have been received from Virginia Department of Highways and Transportation (VDHT) and incorporated into the EIS analysis. The proposed improvements indicate that the specific links of Route 1 assessed in the EIS should operate at satisfactory levels of service in 1990 under all of the policy alternatives.

Response 5a - Sully Road Level of Service F: This level of service exists in 1990 for all policy alternatives and results mainly from non-airport related traffic.

Response 6 - Access and parking will be added to Dulles Airport as necessary in order for the airport to assume the role as determined by the MWA Policy. See the traffic section of the FEIS for Dulles concerning future metro shuttle bus service to Dulles.

Response 7 - See Reponse Number 2.

Response 8 - The FEIS contains a range of policy options with various scheduling and operating curfew provisions. However, none of the policy options reserve separate scheduling hours strictly for commuters. Such a provision could potentially discriminate against air carrier and general aviation.

Response 9 - The FEIS contains a range of policy options with various perimeter configurations. However, the specific allocation of air carrier slots is not within the scope of this policy effort.

Response 10 - The Department does not see the necessity for this proposal. Due to the limited range of typical commuter aircraft nonstop service beyond 300 miles is not common.

Response 11 - The FEIS contains a policy option with a 650 mile perimeter for National. The air services section of the FEIS details the impacts on air service among the various policy options. The noise impacts of a 1,000 mile perimeter are discussed in the noise section of the FEIS for National. The perimeter alone would not change pollutant emissions from aircraft.

Response 12 - The FEIS contains a range of policy options with various passenger ceilings.

Response 13 - Access will be added at Dulles Airport as necessary in order for the airport to assume the role as determined by the MWA Policy. However, it is important to realize that increased utilization of Dulles can only come about through an MWA Policy that controls the utilization of National Airport. Without an underlying policy, access improvements at Dulles will generate little increased utilization of the airport.

Response 14 - The MWA Policy will define a role for National and Dulles Airports. The detailed development of general aviation facilities at Dulles will be determined in the master plan that follows this policy effort.

NATIONAL CAPITAL PLANNING COMMISSION

1325 G STREET NW.

WASHINGTON, D.C. 20576

In Reply Refer To:
NCPC Files Nos. MP10 & MP26

April 15, 1980

Mr. James A. Wilding, Director
Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport, Hangar 9
Washington, D. C. 20001

Dear Mr. ~~Wilding:~~ Jim

In response to your request, the National Capital Planning Commission, at its meeting on April 10, 1980, transmitted recommendations and comments to the Federal Aviation Administration on The Metropolitan Washington Airports Policy -- supplement to the Draft Environmental Impact Statement, January, 1980.

A copy of the Memorandum of Action taken by the Commission, is enclosed for your information.

Sincerely,

Reginald W. Griffith

Reginald W. Griffith
Executive Director

Enclosure

NATIONAL CAPITAL PLANNING COMMISSION

1325 G STREET NW.

WASHINGTON, D.C. 20576

NCPC Files Nos. MP10 & MP26

METROPOLITAN WASHINGTON AIRPORTS POLICY -
SUPPLEMENT TO THE DRAFT ENVIRONMENT
IMPACT STATEMENT

Memorandum of Action

April 10, 1980

UPON MOTION by Mrs. Loikow, seconded by Mr. Parsons, and carried (Mr. Kerley voting "No"), the Commission transmitted the following recommendations and comments to the Federal Aviation Administration on the Metropolitan Washington Airports Policy - Supplement to the Draft Environmental Impact Statement, January, 1980:

Comment No.

General Recommendation

The Commission believes that the adverse environmental and other impacts on the Nation's Capital of Washington National Airport, including operations thereat, warrant its discontinuance as a commercial airport at the earliest practical time and removal of flight operations to other new and/or existing airports in the Baltimore-Washington Bi-Region. Accordingly, the Commission requests that FAA submit a timetable for phasing out commercial airport operations at DCA. Such a timetable should provide for completion of the phasing out by 1990 and should be submitted within six months to the Commission for its use in completing and adopting the Federal Air Facilities element of the Comprehensive Plan for the National Capital. The following comments and recommendations are predicated on the continued use of DCA for a period ending not later than 1990. 1

Proposed Policy Elements

"1. The mechanism for achieving the managed growth goal for National will consist of a progressive reduction in the number of hourly air carrier scheduled

slots. During the initial year of this policy, air carrier activity at National will be limited to no more than thirty-six (36) 'schedules' per hour, (versus present 40) exclusive of extra sections, between 7 a.m. and 8:59 p.m. and eighteen (18) 'schedules' between 9 p.m. and 9:30 p.m. Extra section service will be permitted to continue. Each year thereafter, the rate of air passenger growth and the absolute air passenger level will be evaluated in light of the managed growth program and appropriate slot changes made to ensure the success of that program. Air carrier activity at National will not be scheduled after 9:30 p.m. and before 7 a.m. Air carrier aircraft are defined as those aircraft with a passenger capacity of fifty-six (56) or more."

Comment No.

RECOMMENDATION: The daily hours of operation for Washington National Airport should be limited to 7:00 a.m. to 8:59 p.m., except for Saturday, which should be limited to 7:00 a.m. to 11:59 a.m., and Sunday, which should be limited to 12:00 noon to 8:59 p.m. By 1985, a limitation of an average of 30 operating slots per hour for certified air carriers, including extra sections, should be implemented. 2

COMMENT: A comparison of "Existing Condition" NEF 30 and 40 noise contours contained in the March 1978 Draft EIS and those in the January 1980 Supplement to the Draft EIS, for the Proposed Policy - 1990, indicates that they are essentially the same. In each, the hours of operation, fleet mix, and other factors in determining the noise contours were essentially the same. The primary difference between the two involved the operations/hour for carrier aircraft (40 or 36). The reduction in 4 ops/hour has a minimal effect in reducing the extent of ground area encompassed by the noise contours. In addition to the suggested 10 operations/hour reduction, the suggested cut back in operationing hours to 8:59 p.m. would also further reduce the noise impact, particularly on the parklands in proximity to the Potomac River. With these two policy changes in place, evening public activities could again be scheduled in late spring, summer and earlier fall on various park lands that have historically supported outdoor programs. The noise contours would more closely resemble those found in the Supplement DEIS which represents the Restricted Growth alternative with the recommended slot and hours of operation reduction.

Based on the Supplement the average daily air carrier operations per day, including extra sections, in August, 1979 was found to be 39. That is, on a daily average extra sections were within the present limits on air carrier operations. Based on the daily average, extra sections should be accommodated in the recommended 30 slot limitation for hourly operations for air carriers.

"2. Commuter activity at National will be limited to no more than twelve (12) 'schedules' per hour (versus present 8) between 7 a.m. and 8:59 p.m. and six (6) "schedules" between 9 p.m. and 9:30 p.m. Consideration will be given to increasing commuter aircraft activity as corresponding air carrier activity is reduced.

Commuter activity at National will not be scheduled after 9:30 p.m. and before 7 a.m. Commuter aircraft are defined as those aircraft with a maximum passenger capacity of less than fifty-six (56). Consideration will also be given to the option of increasing the commuter 'schedules' to fifteen (15) per hour by transferring three (3) hourly slots from general aviation to the commuters."

RECOMMENDATION: National's role as a "short-haul" - commuter airport should be strengthened by transferring some of the air carrier slots to commuter airlines. 3

COMMENT: National's location is convenient to downtown Washington and many of the major Federal departmental offices. Most commuter flights are short in length and because of aircraft size can serve many communities not capable of accommodating the conventional air carrier. By having a sufficient number of slots available for use by commuter aircraft it is assumed that market and scheduling forces will greatly improve the airports local service role for many of the smaller communities on the east coast that are now denied such service because of "slot" limitations.

"3. National will be closed to all aircraft after 10:30 p.m. and before 7 a.m., except for emergencies. Dulles will remain open for continuous operation twenty-four (24) hours a day."

RECOMMENDATION: National should be closed to all aircraft after 9:30 p.m. and before 7:00 a.m. and for a twenty-four hour period from noon on Saturday to noon on Sunday. 4

COMMENT: This recommendation is in keeping with the recommendations on policy statement No. 1 above.

"4. A nonstop service perimeter for National will be defined. The following options are under consideration: (a) The existing 650-statute mile perimeter with the seven "grandfather" exemptions for cities currently holding nonstop service, and (b) all cities within a 1000-statute mile perimeter of National Airport."

RECOMMENDATION: Limit nonstop service perimeter for National to 600 miles. 5

COMMENT: By increasing the perimeter rule to 1000 miles, larger aircraft with bigger and heavier payloads may be encouraged. This could tend to increase noise because of the thrust needed for lift-off. If the perimeter is increased then the number of slots allocated to commuter aircraft should also be increased. The short-haul market may be "short-changed" under such a 1000 mile policy because the longer hauls tend to be more profitable. Many of the airlines may opt to replace existing short-haul service with service to cities in the medium haul market. If the ultimate role of National is to be a short haul airport the 1000 mile perimeter rule may

be self defeating. It is more logical to limit National's perimeter. Six hundred miles appears to be a reasonable perimeter, that includes both Chicago and Atlanta, major airline hubs, one serving the heartland and the other the South.

"5. Air carrier turbojet operations at National will be limited to two- and three-engine aircraft, including wide-bodied aircraft. Wide-body aircraft will be permitted at National after demonstration, to the satisfaction of the Federal Aviation Administration, of the ability of these aircraft to operate into and out of the airport and the capability of the landside elements of the airport to accommodate the passenger levels expected from the operation of such aircraft."

RECOMMENDATION: The Commission concurs with this policy, provided National can accommodate such aircraft. 6

COMMENT: The current generation of wide-body aircraft have considerably quieter engines and would tend to reduce noise impact by replacing the existing aircraft now using the airport. With a substantial number of new generation aircraft in the fleet mix serving National in the next decade the noise impact would be improved. The projected fleet mix to 1990, in the Supplement DEIS, which included wide bodied aircraft, was used to develop the 1990 noise contours.

Additional Comments and Recommendation

1. The Commission will re-examine the 1980 Policy to strive toward changes in the operating policies in order to further reduce environmental impacts on the National Capital Region and achieve the orderly phasing out of DCA in the context of a Federal Air Facilities element of the Comprehensive Plan for the National Capital. 7

2. A ceiling on air passengers for National, not to exceed the 1979 level (15.2 million), should be established. 8

Under the caption "Proposed Metropolitan Washington Airports Policy" in the Supplement the Policy Elements, listed above, are preceded by a preamble or statement of purpose:

"A more balanced utilization among the regional air carrier airports will be achieved through a program of managed growth to be undertaken at National. Under this program, FAA will immediately commence the reduction in the rate of air passenger growth at National and establish a permanent air passenger limit, not to exceed 18 million total annual air passengers.

"The scheduling hours at National will be reduced and the airport closed at night, except for emergencies, to afford local citizens in the Washington area an immediate measure of relief from aircraft noise.

"A nonstop service perimeter at National will be defined.

"Dulles will enhance its regional role by accepting an increasing share of the regional air passenger volume brought about by this policy."

Nowhere in the "Policy Element" is the 18 million annual air passenger ceiling mentioned, although all of the other items listed are included in one or the other of the "Elements." It is confusing to the reader to determine whether the ceiling is or is not part of the element under the existing format for presenting the proposed policy. 9

3. The highest priority should be given to providing metrorail service to Dulles Airport by 1990, to accommodate its increased share of Bi-regional air passenger volume. 10

4. Greater utilization and promotion of the rail service in the Northeast Corridor should be encouraged to release the pressures for air service to National within this corridor. 11

The National Capital Planning Commission

Response 1 - The FEIS contains an environmental assessment for a range of policy options. The Department of Transportation (DOT) will select a policy for Metropolitan Washington Airports from within the range of alternatives presented. DOT is aware of the concerns of NCPC. The MWA Policy will balance a complex combination of competing interests that have influenced the two Federal airports, including the impacts on parklands.

The policy options in the FEIS do not include the alternative of closing Washington National Airport. The phase out of National is not a reasonable alternative given the responsibility of DOT to serve the air transportation needs of the Nation's Capital. The forecast increase in the numbers of air passengers through the remainder of this century necessitates three major air carrier facilities in this region. In 1978, NCPC comments to the DEIS on a proposed MWA Policy stated:

> "The anticipated air passenger volumes confirm that by 1995 the Bi-region will require three commercial aviation ports to handle the projected volumes. If Washington National Airport were to be phased out of operation by 1995 a new site would be required for an airport somewhere in the Washington Metropolitan Area. For the purposes of the review of the proposed policy for National Airport it is assumed that it is impractical to consider that National would be phased out of existence within the next 20 years and it will continue to be an important element on the region's air transportation system."

Response 2 - The range of policy options in the FEIS includes various scheduling and operating hour combinations and various slot levels. However, the operating hour reductions as proposed by NCPC would result in significant service disruptions and would be inconsistent with the responsibility of the Department in serving the air transportation needs of the Nation's Capital. It is not considered a reasonable alternative for detailed consideration.

Response 3 - The range of policy options in the FEIS includes the transfer of air carrier slots to commuters at National Airport.

Response 4 - See Response Number 2 above.

Response 5 - The range of policy options in the FEIS includes various perimeter options, including a 650 mile perimeter. The difference between a 650 mile vs. 600 mile perimeter would exclude Chicago from nonstop National service.

Response 6 - The range of policy options in the FEIS provides for wide body (two- and three-engine) service at National Airport.

Response 7 - See Response Number 1.

Response 8 - The range of policy options in the FEIS provides

various proposed passenger ceilings from 14 million per year up to an unlimited level (Expanded Growth).

Response 9 - The MWA Policy proposal released in January 1980 included a passenger ceiling at National of 18 million per year. This option has been retained in the FEIS.

Response 10 - Airport access to Dulles will be added to support the role designated to that airport by the MWA Policy.

Response 11 - See pages 291 through 306 of the Draft Environmental Impact Statement for a proposed Metropolitan Washington Airports Policy, March 1978.

Hon. Lee H. Wigren, Chairman
Fairfax City
Charles A. Funn, Vice-Chairman
Arlington County
Joseph B. Wisniewski, Treasurer
Fairfax County
John W. Epling
Executive Director

Northern Virginia Planning District Commission

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As of March 1, 1980

April 11, 1980

Mr. James A. Wilding
Director
Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport
Hangar 9
Washington, D.C. 20001

Comment No.

Dear Mr. Wilding:

The Northern Virginia Planning District Commission has reviewed the application described below and recommends favorable action by the grantor agency.

In regard to this application, we wish to make the following comments:

The NVPDC supports the objectives of the proposed policy to achieve a more balanced utilization of the region's airports through a managed growth program for National Airport and a consequent enhanced role for Dulles Airport. In particular, the Commission concurs with the elements of the proposed policy which call for a mandatory nighttime curfew on air operations, the introduction of wide-body aircraft, and a ceiling on annual passengers served by National. The implementation of a mandatory night curfew at National Airport at 10:30 p.m. will reduce aircraft noise impacts in Northern Virginia, particularly in the City of Alexandria, Arlington County, and in portions of eastern Fairfax County. In addition, the concepts of wide-body aircraft use and an annual passenger ceiling at National have consistently been supported by NVPDC, the Metropolitan Washington Council of Governments (COG), and area local governments. 1

However, the NVPDC believes that the proposed policy still does not go far enough in effecting a 2

Comment No.

significant diversion of operations from National to Dulles, as called for in the Commission's comments on the draft Environmental Impact Statement (EIS) in 1978. Even with an 18 million passenger ceiling, National will retain fifty percent of the region's air passenger traffic in 1990, continuing the problems of aircraft noise pollution and overburdened ground access and terminal facilities associated with current operations at National, as well as the under-utilization of Dulles Airport. From the analysis presented in the Supplement, it is clear that the "restricted growth" alternative would have the least overall noise and air quality impact of the proposed alternatives. Therefore, in order to achieve a more rational distribution of passenger traffic between National and Dulles as soon as possible while minimizing air and noise pollution problems in the region, the Commission urges the FAA to adopt a "restricted growth" ceiling of 16 million annual passengers at National. In concert with this ceiling, NVPDC expresses its hope that FAA will ensure implementation of its Noise Abatement Program at National and Dulles. 2

In addition, NVPDC reiterates its previous recommendation to FAA to encourage the use of wide-body aircraft as a positive step toward achieving the fuller utilization of airport facilities and the reduction of adverse environmental impacts associated with the region's airports. As recommended in the Commission's comments on the draft EIS, the final EIS should address the potential substitution on wide-body aircraft for conventional air carriers on a one-for-two basis. Finally, the Commission urges the FAA in its final airports policy to outline specific recommendations for improving transportation access to National and Dulles, including mass transit options for both airports and the expeditious completion of the Dulles Airport Access Road Connector. 3

In conclusion, before the EIS is finalized, a more extensive economic analysis should be completed regarding the impact of the proposed shift of flights from National Airport to Dulles and Baltimore Washington International Airports. 4

Your cooperation in the intergovernmental review process is appreciated.

Sincerely yours,

John W. Epling
Executive Director

SUBJECT: Project Notification Review
Applicant: Federal Aviation Administration
Project: Draft EIS - Metropolitan Washington Airport Policy (Supplement)
Control Number: 80-08-191A
Staff Contact: Martha Semmes

The Northern Virginia Planning District Commission

Response 1 - No response necessary.

Response 2 - The concerns of NVPDC are recognized, The FEIS provides an environmental assessment of a range of policy alternatives. One of the alternatives, Controlled Growth of 16 Million Passengers, contains a 16 Million cap.

Response 3 - See Response Number 2 above. In addition, the Department of Transportation is not in a position to make scheduling decisions for the Nation's airlines by requiring a one-for-two provision in using wide bodies at National. In fact, such a provision might be a disincentive to the use of such aircraft at National. Access will be added at Dulles as necessary to enable it to fulfill its role as designated by the MWA Policy.

Response 4 - The FEIS provides a summary of the economic impacts of various policy options. A detailed economic analysis of policy options will be available when the Department of Transportation selects a Metropolitan Washington Airports policy.

WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
600 Fifth Street, N.W., Washington, D. C. 20001
202) 637-1234

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General Counsel

APR 1 1 1980

Metropolitan Washington Airports
Environmental Policy Section
Washington National Airport,
Hangar 9
Washington, D.C. 20001

Dear Sirs:

The Washington Metropolitan Area Transit Authority has reviewed the draft supplemental environmental impact statement (DEIS) for a proposed Metropolitan Washington Airports policy. The Authority agrees with the findings of the report related to airport-oriented transit service and transit usage. However, there is an omission in the report affecting transit service to Dulles Airport that should be pointed out.

A special bus-only loading facility is being constructed in the median of I-66 at the West Falls Church Station (see attached plan). This bus facility will have direct ramp access from the Dulles Airport Access Road. Airport passengers will be able to conveniently transfer between bus and rail at this station. In addition, the station is designed to allow airport passengers to transfer from airport express buses to local feeder buses that radiate out from the station into Falls Church and portions of Arlington County and Fairfax County.

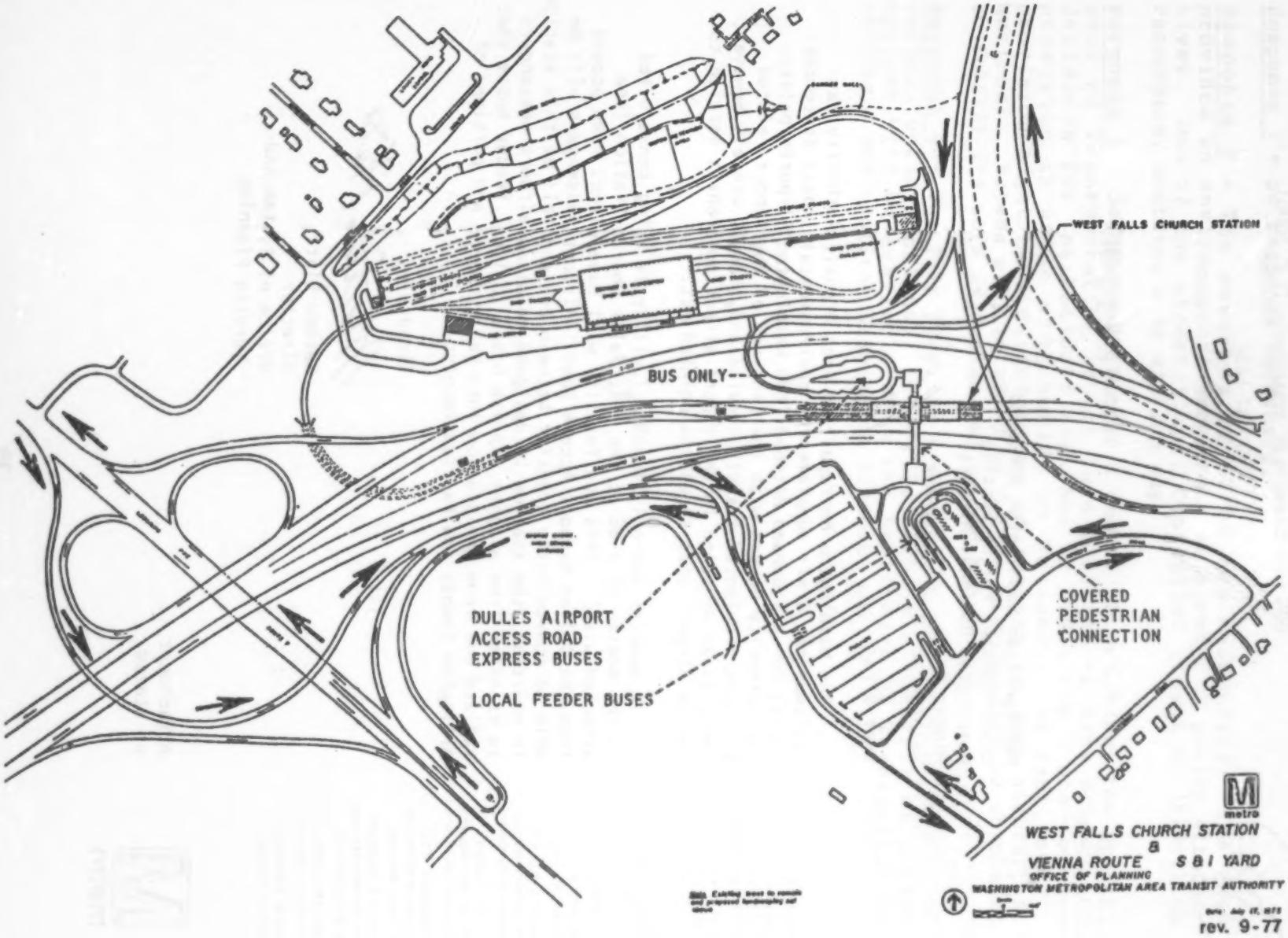
Sincerely,

Mathew Platt

Mathew Platt
Director
Office of System and
Service Planning

metro

Attachment
as stated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WASHINGTON METROPOLITAN AREA TRANSIT AUTHORITY
rev. 9-77

The Washington Metropolitan Transit Authority

Response 1 - The additional information provided by you has been added to the Dulles Surface Access portion of the FEIS.

Comments from the Arizona Department of Transportation

The only practical effect of the proposed arbitrary and capricious limitation on nonstop operations to and from Washington National Airport is to unfairly discriminate against cities such as Phoenix and Tucson which are outside the 650 or 1,000-mile limit. Such discriminatory treatment must not be permitted. To the extent that operational limitations do not preclude nonstop service from Washington National Airport to distant parts of the United States, the citizens of this country should be permitted to enjoy the benefits of air transportation on a nondiscriminatory basis to Washington's most convenient airport facility.

best copy available

The Arizona Department of Transportation

Response 1 - The FEIS provides an environmental assessment of a range of policy options. However, none of the policy options consider the complete elimination of the nonstop perimeter for National Airport. The elimination of the perimeter would result in major disruptions to existing service patterns and a drastic impact to existing service at Dulles Airport. See the Air Service sections of the FEIS for further information.

STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION
P.O. BOX 25201
RALEIGH 27611

JAMES B. HUNT, JR.
GOVERNOR

THOMAS W. BRADSHAW, JR.
SECRETARY

DIVISION OF AVIATION
(919) 733-2491

80 APR 18 A 11:48

April 10, 1980

Federal Aviation Administration
Office of the Chief Counsel
800 Independence Avenue, S.W.
Washington, D. C. 20591

Attention: Rules Docket AGC-24

Reference: Answer of the North Carolina Department of Transportation in Regard to the Federal Aviation Administration's (FAA) 'Notice of Proposed Rulemaking' Appearing in Dockets 19948 and 19950: Notice No. 80-21.

Gentlemen:

Comment No.

One of North Carolina's major destination markets is the Washington area which accounts for close to 700,000 O&D passengers out of our state. Accordingly, we have an interest in the outcome of NPRM 19948 and 19950.

We are concerned over the proposed loss of 118 flights or 18% of the existing artificially limited capacity of National and its effects on North Carolina's traveling public. Should the short haul passengers be forced to use Dulles or BWI instead of National, the ground travel time from downtown Washington to Dulles or BWI would exceed the flying time between destinations. On the 1000 mile flight, on the other hand, the percentage of the total trip spent getting to and from the airport in Washington would go from about 14% using National to about 28% using Dulles or BWI. In short, the passenger on the shorter haul flights would be penalized to a far greater extent than the longer haul passenger if forced to use an airport other than National. 1

Comment No.

We believe that offering the majority of slots to carriers on a highest bid basis combined with removing restrictions on the longer haul flights and allowing wide body aircraft into National, would result in displacement of short haul passengers to the less convenient airports. 2

We recommend that FAA and Congress take steps to enhance the role of the National Airport as a short haul hub. This can be done by not changing the current nonstop flight length limitations, and by providing an increase in the number of landing slots available during appropriate non-environmentally sensitive hours for short haul (under 650 miles) and commuter operators. At the same time, we recommend strengthening the public transportation ground access from Washington to both Dulles and BWI. 3

We believe that the short haul traveler will be depending on air transportation more and more to meet his transportation needs. The only way those needs will be met in the Washington-Baltimore area is to develop a truly integrated system of airports with convenient ground access. While the long term future key lies with Dulles and BWI, we believe that any lessening of National's role as a short haul hub in the short term, can only be a detriment to North Carolina's citizens for whom Washington has traditionally been the second largest air travel market. We do not think this deterioration of short haul service will be offset by the marginally better access obtained by long haul users. In the long term the development of a systems approach to the three airports which, combined with frequent, high speed public transportation ground access to Dulles and BWI, will benefit every Washington air passenger. Such a system is mandatory if the future air transportation needs are to be met. 4

Sincerely,

Willard G. Plentl, Jr., P. E.
Director

WGPjr:mp

The State of North Carolina

Response 1 - The FEIS provides an environmental assessment for a range of policy options. DOT is aware of the concerns of the State of North Carolina. The MWA Policy will balance a complex combination of competing interests that have influenced the two Federal airports. See the Air Service section in the FEIS for National concerning air service impacts among the various policy options.

Response 2 - See Response Number 1 above. In addition, none of the MWA Policy options in the FEIS consider the allocation of slots among the air carriers by an auction or on an administrative basis.

Response 3 - See Response Number 1 above.

Response 4 - See Response Number 1 above.

Comments from the New York State Department of Transportation

Comment No.

The Department supports the FAA in their effort to establish clear roles for the Metropolitan Washington airports through a formal policy rulemaking procedure. Generally, we feel that the proposed policy on roles for Washington National and Dulles International Airports is reasonable, especially considering the often conflicting factors involved (such as environmental concerns, surface access travel time/distance, airport facilities and deregulation); however, we do have some reservations concerning certain aspects of the proposed policy. Our comments follow.

Program of Managed Growth

We agree with the establishment of a growth limitation policy, but we question the measure selected for the proposed policy. Limiting growth by restricting the number of passenger enplanements does not consider possible changes in types of aircraft serving the airport. Was a growth limitation policy considered that would be based on aircraft operations (possibly weighted by aircraft category)? This latter approach would seem to be superior to the proposed restriction unless passenger terminal facilities are a constraining factor. 1

Allocation of Airport Slots

We recognize the need for a slot allocation policy to complement the growth limitation policy. However, we question whether the implications of the current proposal have been adequately considered. We do not see a definite need to provide service for small communities by the reservation of slots for commuter carriers. On the other hand, we question the equity of increasing commuter carrier capacity at the expense of certificated air carrier capacity when an airport growth policy is being implemented.

A more even-handed policy would distribute the growth limitations to both types of carriers. Another concern in this respect is whether the commuter carrier slot allocation methodology will assure that the slots are assigned - at least on a higher priority basis - to communities without certificated service. 2

Hours of Operation

The restriction on the hours of operation should be justified on the basis of noise considerations, not as a growth restricting measure (as implied in the text, p. 4323). 3

Aircraft Type Restrictions

We support the proposed policy to allow operation of two- and three-engine wide body aircraft if they are compatible with airport facilities. 4

Comment No.

Mileage Limitation

Based on equity considerations, we support a 1,000 mile limitation on direct service rather than the existing general policy of 650 miles with seven allowed exceptions. 5

The New York State Department of Transportation

Response 1 - The FEIS provides an environmental assessment of a range of policy options. The Controlled Growth alternatives at National utilize a passenger ceiling that results in rollbacks in air carrier operations. The Reduced Activity alternative at National reduces air carrier operations on a fixed schedule regardless of passenger levels although a 14 million passenger ceiling is established as a goal.

Response 2 - See Response Number 1 above. In addition, the specific allocation of commuter slots among users and cities is not within the scope of the policy options presented in the FEIS.

Response 3 - See Response Number 1 above. The Controlled Growth and Reduced Activity alternatives result in reduced noise impacts as compared to existing 1979 conditions.

Response 4 - No response necessary.

Response 5 - No response necessary.

Comments from the State of South
Carolina State Budget and Control Board

It is our understanding that present plans call for the reduction of air traffic into National Airport in Washington, D.C., with the ultimate purpose being to close this facility entirely. I would like to add my voice to those who have requested that this airport be retained in its present status if such an alternative is at all possible.

The location of this aiport seems to be ideal and the new rapid transit system makes commuting to Washington relatively painless.

Again, we hope that you can see fit to maintain National Airport in its present state of operation.

The State of South Carolina State Budget and Control Board

Response 1 - The FEIS provides an environmental assessment of a range of policy options. The Department of Transportation will select a policy for Metropolitan Washington Airports from within the range of alternatives presented. The closing of National Airport is not a policy option under consideration.

Comments from Local Metropolitan Washington
Area County and Municipal Governments

Comment No.

The seven recommendations that the Board submitted conceptually during your public hearing on March 27 now constitute the County's official position on this matter. They are reaffirmed as follows:

(1) The policy at Washington National Airport will be to reduce rather than to increase the extent of aviation traffic with attendant abatement in noise and air pollution.

(2) In order to accomplish this goal as quickly as possible, wide bodied aircraft will be phased in on a one-for-two basis (i.e., one wide bodied for two narrow bodied), as quickly as safety considerations will permit. The target of this transition can be a 50% reduction in air carrier operations per hour by 1985.

(3) During this transition to the wide bodied aircraft and until the number of flights starts to decrease, a mandatory limit of 16 million passengers annually should be set at Washington National. Numbers in excess of 16 million should be scheduled equitably between Dulles and Baltimore-Washington International. 1

(4) An alternate strategy must be developed for short-haul traffic. Passengers traveling in the northeast corridor should be aware of increased national resources that are being given to railroads. In this way shuttle flights can be reduced.

(5) With a capacity of 16 million passengers per year in effect, capital improvements at Washington National can be limited to existing terminal facilities and access roadways. Any requirements for expanded operational facilities will be eliminated.

(6) The FAA is currently encouraging an innovative and aggressive noise abatement at all airports throughout the nation. It is assumed that the two airports owned and operated by the Federal Government will be the model for others to follow in this commendable effort.

(7) Except for emergency situations, the hours of operation at Washington National should be from 7:00 a.m. to 9:00 p.m.

The Mayor and Members of the City Council, at the March 25th Council Meeting, and after review of the Federal Aviation Agency's (FAA) 1980 Proposed Metropolitan Washington Airport Policy, unanimously agreed that the Mayor present the City of Alexandria's views on the proposed policy at FAA's March 27th Public Hearing. Furthermore, it was agreed to forward the City's position to you in writing. Accordingly, the City proposes the following changes be incorporated into the 1980 Proposed Metropolitan Washington Airport Policy prior to final adoption of the policy. 2

Comment No.

1. That FAA take action to limit growth to current levels by placing a 15 million annual passenger capacity limit at National Airport. FAA indicates in its 1980 Supplement that a 16 million passenger cap results in a reduction from the current scheduled 40 slots to 22 slots per hour. A 15 million cap would provide a similar slot reduction. 2

2. That future growth in excess of the current level of 15 million passengers be diverted to Dulles Airport which has the capacity and the equipment to satisfy the increased passenger load and the capability for all types of aircraft to takeoff and land under all weather conditions.

3. That action be taken by FAA to require aircraft to fly a course which approximates river center at least past the beltway.

4. That pilots of all scheduled and non-scheduled aircraft using National Airport utilize all practical noise abatement procedures in the operation of the aircraft.

5. That no scheduled trips be allowed to leave National Airport that go beyond the 650 mile limit.

6. That wide body aircraft be allowed at National Airport provided that compensating trip reductions be made to keep maximum annual passenger to current levels. In fact, National's single runway operation will require several minutes of extra spacing of the flight immediately following the "wide body heavy" because of the wing vortex problem that FAA recognizes in its operations policies. This obviously will result in fewer flights per hour this we favor.

7. That FAA seriously consider promoting the development of public transportation to Dulles either by extension of metrorail from the future Vienna station to Dulles or at least by very frequent metrobus connections to the future metrorail station. Senator Spong of Virginia sponsored a bill in 1970 to study the feasibility of extending metrorail to Dulles. $250,000 was spent on the study. It is gathering dust.

8. Consideration be given to the use of competitive methods of transportation means to include rail or bus to move potential passengers and satisfy short haul demands in the northeast corridor.

Air Pollution

The metropolitan area, which includes all of National Airport, is in a non-attainment air pollution area caused chiefly by the pollutant ozone. Hydrocarbons emitted by the automobile are the primary and major factor in producing ozone. Because Metropolitan 3

Comment No.

Washington is a non-attainment pollution area, the local governments had to develop transportation strategies to offset the increase in hydrocarbons. Just recently, the governing bodies of Maryland, the District of Columbia and the Commonwealth of Virginia were required by the Federal Government to pass legislation directed at reducing hydrocarbons. Beginning January 1, 1982, area residents owning automobiles are now required, at individual expense, to have each of these vehicles inspected for emissions. To this pollution non-attainment environment, where citizens are taking all available measures to reduce pollution and the federal Government is threatening to impose sanctions, the FAA is proposing an increase in airport passenger activity which increases the automobile activity and in turn increases the hydrocarbons. Unfortunately, for the residents of the area, this will cause an increase in air pollution, an additional health hazard. 3

Local Metropolitan Washington Area
County and Municipal Governments

Response 1 - The FEIS contains an environmental assessment of a range of policy options. The provisions contained in the Fairfax County policy recommendation are contained within the policy options under consideration with the exception of the following:

- Should wide body aircraft be admitted at National, it will not be on a one-for-two basis. A provision of this type would be a disincenative to use wide bodies.

- Passengers not using National would use Dulles or Baltimore-Washington Airports as determined by the competitive market. Passengers would not be assigned to an airport. The Department of Transportation does not have the authority to schedule aircraft owned and operated by the Nation's airlines.

- Investment in rail facilities in the Northeast corridor is for the purpose of competing with the air, bus and automobile modes of travel. All of these modes will be needed to satisfy travel demand.

- The MWA Policy in itself is not intended as a model for all other airports. The Department of Transportation has published guidance for airport operators to abate aircraft noise (i.e., U.S. DOT Aviation Noise Abatement Policy of 1976).

- The pólicy options under consideration contain various scheduling and operating provisions, including a curfew at National. However, an operating curfew earlier than 10:30 p.m. at National would be too disruptive to air service with little to gain.

Response 2 - The FEIS contains an environmental assessment of a range of policy options. The provisions included in the City of Alexandria's policy recommendation are contained within policy options under consideration with the exception of the following:

- Passengers not using National would use Dulles or Baltimore-Washington Airports as determined by the competitive market.

- National Airport has published noise abatement flight procedures. Such procedures are not part of the MWA Policy.

- See Response Number 1 regarding alternative modes of transportation.

- Once a role for Dulles Airport is established, improved access will be added as necessary to fulfill that role. See Surface Access section of the FEIS for Dulles concerning metro shuttle bus facilities.

Response 3 - The FEIS contains the air quality impacts of the various policy options under consideration including the impacts on regional ozone levels. However, two points regarding this comment need to be clarified: First, the policy options explore various distributions of the same number of total regional passengers among the three airports. None of the policy options generate additional air passengers for the region. Second, ozone is a regional not a local phenomenon. See the Air Quality section of the FEIS. Theoretically, the greater the allocation of passenger traffic to Dulles and Baltimore-Washington Airports, the greater the contribution by airport access vehicles to regional ozone.

FAIRFAX COUNTY, VIRGINIA

MEMORANDUM

TO: David W. Stroh, Assistant Director
Office of Comprehensive Planning
Environment and Policy Division

DATE: March 3, 1980

FROM: Daniel G. Helms, Director
Air Pollution Control Division
Fairfax County Health Services

FILE NO:

SUBJECT: Input to Supplement to the Draft Environmental Impact Statement (DEIS) for a Proposed Metropolitan Washington Airport Policy

REFERENCE: Your Memo Dated February 7, 1980
Supplement to the Draft Environmental Impact Statement (DEIS)
for a Proposed Metropolitan Washington Airports Policy

We have reviewed the DEIS as it applies to Dulles Airport and its resultant impact on air quality in Fairfax County. Our analysis includes comments on the impact on air quality of the proposed policy and its alternatives, a comparison of Fairfax County monitored air quality data with data presented in the DEIS, and a summary of our analysis of the DEIS.

We hope our review will be helpful in presenting the County's response. If you have any further questions, feel free to contact me.

DGH:cg

Attachment

RECEIVED
JUL 28 1980
GREINER ENGINEERING SCIENCES, INC.
TAMPA, FLORIDA

Review of the Supplement to the

Draft Environmental Impact Statement (DEIS)

For a Proposed Metropolitan Washington Airport Policy

(Air Quality Impact)

Prepared By

Air Pollution Control Division
Fairfax County Health Services
Daniel G. Helms, Director

Submitted To

David W. Stroh, Assistant Director
Office of Comprehensive Planning
Environment and Policy Division

March 3, 1980

I. INTRODUCTION

The Fairfax County Air Pollution Control Division is concerned with the potential affects on air quality in Fairfax County of the Washington Metropolitan Airports Policy. To ascertain the potential air quality impacts of the Proposed Policy and the three Alternative Policies, we have reviewed the Supplement to the Draft Environmental Impact Statement (D.E.I.S.) supplied by the Federal Aviation Agency and have conducted a comparative analysis of the air quality data presented in the DEIS with air quality data collected from the County's monitoring network. The review and the data analysis are based primarily on the information supplied in the DEIS and on County air quality data. However, in some instances when information is incomplete or the data is subject to interpretation, certain assumptions have been made which will influence resultant pollutant concentrations. When such assumptions are made in our review, they will be so stated.

The Fairfax County Air Pollution Control Division operates and maintains three pollution sampling stations in the proximity of Dulles Airport. The sampling stations, part of a County-wide network for measuring ambient pollutant concentrations, are located at Cub Run, Herndon, and Great Falls. (See attached map.) Cub Run station includes a particulate sampler started in 1970 and a nitrogen dioxide sampler initiated in 1978. The Herndon station has been sampling for particulates since 1974. The Great Falls station has been sampling for particulates since 1970, and for NO_2 since 1978. A fourth particulate sampler located at the Occoquan Dam has been in operation since 1974 and is incorporated into calculations for County background pollutant concentrations. With our particulate and NO_2 data we believe good comparisons can be made with the data presented in the DEIS.

The closest County carbon monoxide and hydrocarbon samplers (the two remaining pollutants addressed in the DEIS) are located relatively distant from Dulles Airport. The Massey Continuous Monitoring Station, 10600 Page Avenue, Fairfax, and the Lewinsville CMS, 1437 Balls Hill Road, McLean, have monitored carbon monoxide, nitrogen dioxide and particulates since 1974. Hydrocarbons have been measured only at Lewinsville since 1974. The pollutant data associated with each can only offer indirect indications of pollutant levels in the Airport vicinity.

Comment No.

II. REVIEW AND ANALYSIS OF THE DEIS

A. General Review

Several problems surfaced during review of the DEIS which are important in determining the resultant air quality in the Dulles Airport vicinity. These problems may be a result of the omission of data and information for summarization purposes. These concerns do affect the air quality analysis and should be addressed regardless of origin.

1. The DEIS does not indicate clearly whether the air quality data for Base Case 1976 at Dulles is derived from actual ambient air monitoring or from modeling using emission inventories and emission factors. Both methods can be valid if properly applied; however, with modeling, actual measured concentrations should be employed for model calibration and inventory validation. With actual monitoring, sampling duration must be taken into account for data credibility. A description of the methods, duration, and the applied assumptions used in determining the pollutant concentrations is not offered in the DEIS. The derivation of these concentrations is therefore in question. 1

2. A second concern is the calculation of background pollutant concentrations. Both Table III-14 (Base Case 1976) and Table III-15 (Projected 1990) indicate pollutant concentrations at each receptor point as total and Airport-related. To calculate Airport-related, an ambient background concentration is necessary but no indication is made as to the method used by the DEIS for calculating this essential concentration. As will be seen in Section B of our review, substantial discrepancies exist for background pollutant concentrations. 2

3. In projecting the 1990 pollutant concentrations, a strong reliance has been placed on the capability of emission control devices on non-airport related sources (motor vehicles) in reducing selected pollutant concentrations. These include a 50% reduction in carbon monoxide and reductions in nitrogen dioxide and particulates. The problem arises from whether or not full reduction capability of motor vehicle emission control devices was assumed; or whether a real-life situation of emission control device failure, malfunction, poor maintenance and even tampering, which increases motor vehicle emissions, was taken into account. Studies of automobile emissions show conclusively that air pollution control devices on a large percentage of vehicles in operation do not function as thoroughly as their original design due to improper maintenance and neglect. If original design efficiency was assumed, the reductions in pollutant concentrations attributed to Federal emission controls in the DEIS 1990 projection are overstated. Unfortunately this important assumption is not explained, placing the impact of Federal emission controls on the 1990 projection in question. 3

Comment No.

A. General Review (continued)

4. The suspended particulates, in ug/M^3, have been listed as 24-Hour and Annual Mean (Table III-14 and Table III-15). We will assume the Annual Mean concentrations are actually Annual Geometric Mean concentrations as required by Federal E.P.A. National Air Quality Standards. Calculating an Annual Arithmetic Mean rather than an Annual Geometric Mean will result in slightly higher (5 to 15%) concentrations. If these overstated concentrations of the 1976 Annual Geometric Mean for particulates were used in the 1990 projections, the projections are also exaggerated. 4

5. The Federal Secondary Air Quality Standard for hydrocarbons has been rescinded. The 0.24 ppm 6 to 9 a.m. value should be considered a guideline only. Considering values over 0.24 ppm as violations of a Federal Standard is erroneous. 5

6. Whether or not the DEIS has taken into account the total pollutant levels projected in 1990 on the basis of growth or no-growth in the Dulles Airport area is questionable. It appears that the DEIS projects 1990 pollutant concentrations only on the basis of increased aircraft operation and the related ground traffic due to increased passenger and employee activity. Assuming a pattern of non-airport related growth in the Dulles area for the years preceding 1990, pollutant concentrations most likely will increase from such development. If this increase is coupled with increased airport-related emissions, total emissions may actually rise in the Dulles area by 1990. For particulates this could lead to violation of the standard. If violations are projected when residential, commercial and industrial growth are factored in and once airport related emissions have increased, will restrictions on non-airport growth in the Dulles area be a necessary pollution abatement strategy for attainment of the Federal Standards? 6

7. Finally, the Alternative Policies of No Change or Expanded Growth at National will have either no adverse affect on Dulles air quality, as compared to existing conditions, or will improve air quality from the current Base Case 1976. In each situation, a review of the air quality impact of the Alternative is not necessary. In the case of Restricted Growth at National, air quality will be impacted at Dulles (as assumed by the DEIS) only minimally above the Proposed Policy (2.0% increase). Therefore the analysis of the Proposed Policy will apply to the Restricted Growth Alternative if minor adjustments in pollutant concentrations are made. In consideration of the similarities in air quality impact on the Alternative Policies in relation to the Proposed Policy, a comparison of data monitored by the Fairfax County Air Pollution Control Division has been made only with respect to the Proposed Policy.

B. Correlation with Fairfax County Air Quality Data

Assuming the DEIS 1976 Base Case Pollutant Concentrations (Table III-14) were monitored data, a comparison with data from the Fairfax County monitoring network reveals some substantial discrepancies. If the DEIS 1976 Base Case is data derived from modeling, the discrepancies still require clarification. For our purposes the 1990 Projected concentrations are assumed to be modeled, based on the 1976 Base Case pollutant concentrations. If this assumption is correct, discrepancies in the 1976 Base Case data will be carried over into the 1990 modeled projections.

Particulates: Annual Concentrations

The largest discrepancy between County data and Base Case 1976 DEIS data exists for Annual Geometric Mean particulate concentrations. Table III-14 shows total and Airport-related particulate concentrations. According to Table III-14, the DEIS has assumed particulate background concentrations of 48.0 ug/M^3, which can be calculated by subtracting the total and Airport-related concentrations. A background concentration for particulates was calculated using Fairfax County data for 1974 to 1979 for three sampling stations; Cub Run, Great Falls, and Occoquan Dam. (See attached map.) From these samplings, a regional background concentration of 38 ug/M^3 was calculated. A discrepancy of 10.0 ug/M^3 exists between County-calculated background particulate levels and DEIS-calculated background levels. This discrepancy results in a higher Airport-related contribution to particulate levels than the DEIS calculated. For example, at Receptor Point #1, the DEIS estimated a total particulate concentration of 52.2 ug/M^3 with a background of 48.0 ug/M^3, yielding an Airport related contribution of 4.2 ug/M^3. Using the County calculated background concentration yields an Airport-related contribution of 14.2 ug/M^3. This estimated Airport contribution is approximately three times the DEIS estimate. The DEIS estimate appears too conservative. Even so, County data for 1976 and 1979 indicate that Cub Run, Great Falls, and Herndon sampling stations are well within the 60 ug/M^3 Annual Standard. Cub Run, the closest County Station to the Airport is influenced little if any by Airport related activities, averaging slightly below the estimated County background concentrations.

On a worst case basis (assuming full impact on our stations) if the total Airport-related contribution is added to the three County stations, both Cub Run and Great Falls are still within the particulate standard. Herndon is slightly over, but may be biased by near-by point sources unrelated to the Airport.

The particulate levels estimated for 1976 and projected for 1990 by the DEIS for Annual Mean Concentrations also indicate levels that are within the Federal Standard. No violations are projected with the increased Airport activity as calculated for the Proposed Policy.

Particulates: Maximum 24-Hour

The maximum 24-hour particulate levels show the same discrepancies as the annual particulate concentrations but to a lesser degree. The difference between County and DEIS calculations for maximum 24-hour particulate concentrations is an insignificant 2 ug/M^3. This variation is minor and should not affect the 1990 DEIS projections.

Of primary concern is the 1990 DEIS projected 24-hour particulate concentrations shown in Table III-15. The Standard is exceeded at every Receptor Point. If the 150 ug/M^3 Standard is exceeded more than once in a calendar year, it constitutes a violation of Federal Air Quality Standards. The DEIS dismisses these high projections and possible violations and concludes that non-airport related activity, "contributes the major portion of all pollutant concentrations" and that airport related contributions are only minor.

It is interesting to note that the County's high 24-hour particulate data for the period 1974 to 1979 at Cub Run has shown only 2 readings over 150 ug/M^3 out of 654 samples. No violations have occurred. At Great Falls only one reading over 150 ug/M^3 occurred out of 654 samples. At Herndon, only one reading out of 601 samples was over the Standard. Projecting these values indicates the DEIS 1990 projections assume too high a contribution from non-airport related sources.

Nitrogen Dioxide

Cub Run and Great Falls 1979 NO_2 data has been used as an estimate of NO_2 background concentrations for the Dulles area of the County. This concentration is .0125 ppm. The DEIS for 1976 Base Case assumes a background NO_2 concentration of 0.033 ppm; however, this is 1976 data and a comparison with the County's 1979 data could be misleading. It is possible to obtain some indication of the effect the proposed Policy will have on NO_2 at County sampling stations by using a worst case situation. If we assume the 1990 County background NO_2 will be 0.0135 ppm (derived from the addition of the 1979 County value of 0.0125 ppm plus 0.001 ppm, the background concentration increase assumed by the DEIS for the period of 1976 to 1990) and then add this concentration to the largest Airport-related concentration in 1990, calculated by the DEIS at Receptor #1, a total NO_2 contribution projected for County sampling stations in 1990 of 0.0485 ppm results. Even in this worst case situation, which assumes full impact of the airport pollutants on County stations, the NO_2 concentration is still slightly under the 0.05 ppm Standard.

Carbon Monoxide

The County operates carbon monoxide (CO) samplers at the Massey station and Lewinsville station. (See attached map.) The great distance of these two stations from Dulles Airport makes CO comparisons virtually impossible. Carbon monoxide shows characteristics of rapid source attenuation and little capability for distant transport. The incomplete combustion of fossil fuels

Carbon Monoxide (continued)

in motor vehicles is the major source of CO in Fairfax County. Motor vehicles vary in density from one portion of the County to the other, making a correlation of DEIS data to County data difficult.

Of interest, however, is the trend of Massey CO levels. The Massey station can be considered the most similar to conditions in the Dulles area. Since 1974, CO levels violated Federal Standards only once and that occurred during unusual meteorological conditions. Therefore, the levels projected by the DEIS, which are well under the Federal Standards for both 8-hour and 1-hour councentrations appear to be valid estimates. The decrease in CO concentrations by 1990 as projected in the DEIS also appear feasible since carbon monoxide, the pollutant most successfully reduced by Federal automobile emissions controls, has shown reductions in other areas of the County during the period of 1974 to 1977 when compared with total vehicle miles traveled. The assumption that automobile emission controls will continue this trend is reasonable.

Hydrocarbons

The hydrocarbon sampling station the County operates closest to Dulles Airport is located at the McLean Governmental Center. (See attached map.) This sampler measures both methane and non-methane hydrocarbons and has been since 1974. For 1976 a mean 6-9 a.m. three hour concentration for total hydrocarbons was 2.24 ppm. For non-methane hydrocarbons the mean 6-9 a.m. three hour was .603 ppm. In comparison to the total hydrocarbon concentrations estimated by the DEIS for Receptor Point #1 of 3.154 ppm, the difference is not large enough to warrant concern, particularly in light of the distance from the Lewinsville station to the Dulles Airport. The DEIS 1976 Base Case data assumes a background concentration of 1.77 ppm. We do not feel our one station reading is sufficient to predict a representative County background concentration for hydrocarbons thereby making a background comparison difficult.

In relation to the Federal Secondary Air Quality guideline of 0.24 ppm., the DEIS has made an apparent mistake. The Standard of 0.24 ppm is supposed to apply to non-methane hydrocarbons only, not to total hydrocarbons. Total hydrocarbons is a combination of both non-methane and methane. It appears that the DEIS is comparing an estimated concentration of total hydrocarbons to a guideline for total hydrocarbons minus methane. This increases the appearance that the Airport hydrocarbons are further over the guideline than they really are. It is unlikely though, that if methane were subtracted from the total hydrocarbons the concentrations estimated in the DEIS would reach or drop below the guideline. County data for 1976 for non-methane hydrocarbons (.603 ppm) which is still substantially over the guideline, supports this.

Hydrocarbons (continued)

The DEIS 1990 projections indicate a decrease in total and Airport-related hydrocarbons. Evidently this projection is based on the effects of Federal automobile emission controls on hydrocarbons. Whether or not the full reduction capability for the automobile emission controls was factored into the projection is questionable. If it was, the likelihood is great that the 1990 projected concentrations will increase since studies show that emissions control devices seldom function at full design efficiency.

III. SUMMARY

The supplement to the Draft Environmental Impact Statement for a proposed Metropolitan Washington Airport Policy has done an acceptable job of estimating the affect Dulles Airport will have on air quality in 1990 under the Proposed Policy. However, the explanation of basic assumptions regarding the derivation of the 1976 Base Case data and the impact of Federal emission controls for reducing pollutant concentrations have been omitted. Dependent on these two assumptions, the 1976 Base Case pollutant concentrations and the 1900 projected pollutant concentrations could be substantially altered.

The conclusion that non-airport activity contributes the major portion of all pollutants is valid but appears over-estimated for certain pollutants. According to data collected by the Fairfax County Air Pollution Control Division, the DEIS calculated Airport contribution for annual particulate and nitrogen dioxide concentrations have been underestimated. For annual particulates, the underestimation has been substantial.

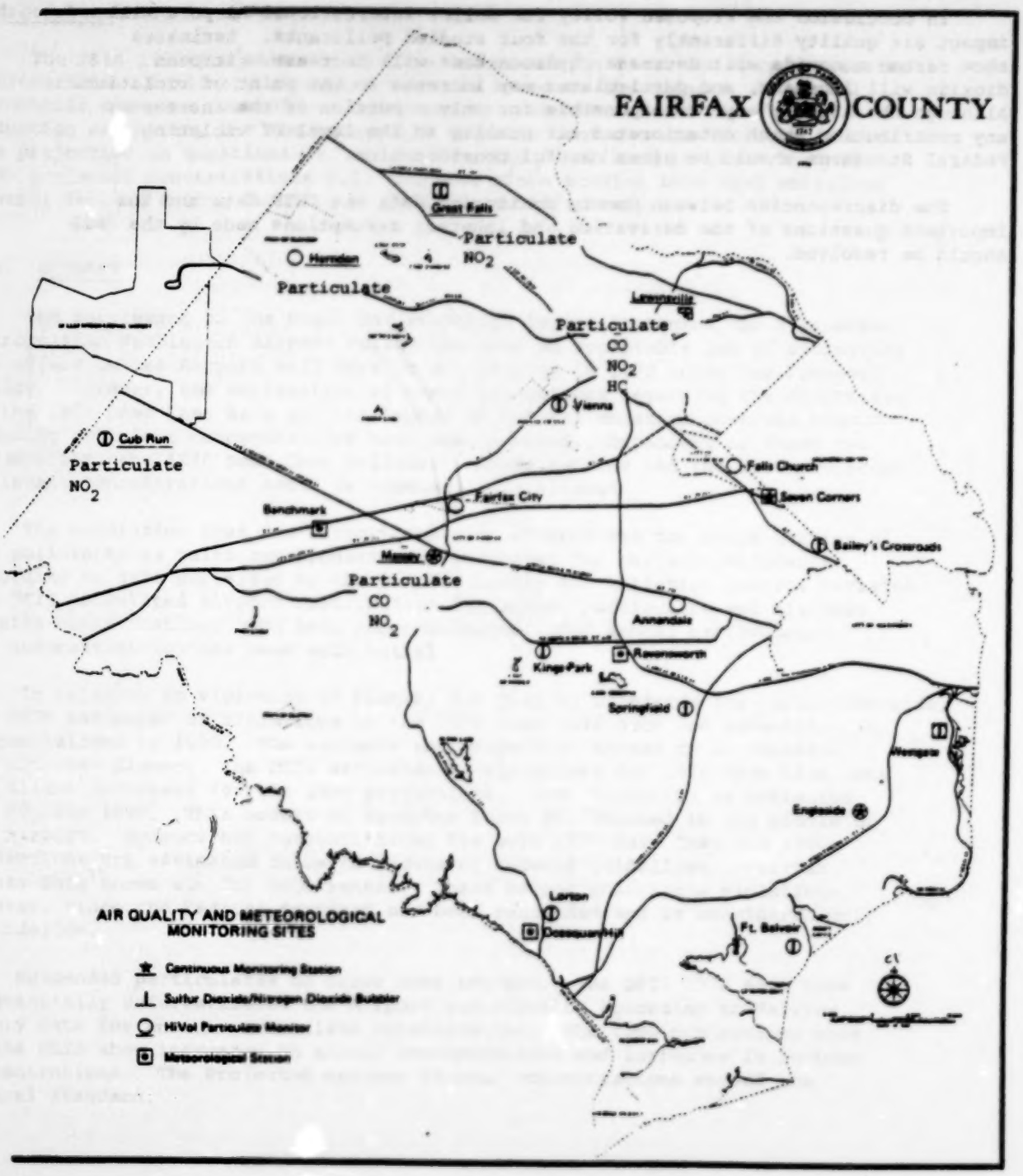
In relation to violation of Federal Air Quality Standards for carbon monoxide, the DEIS estimated no violations in the 1976 Base Case data and reductions in concentrations by 1990. The estimate and projection appear to be feasible. For nitrogen dioxide, the DEIS estimates no violations for 1976 Base Case data and slight increases for the 1990 projections. One violation is estimated for NO_2 for 1990. This occurs at Receptor Point #1, located in the middle of the Airport. Hydrocarbon concentrations for both 1976 Base Case and 1990 projections are estimated to be in excess of Federal guidelines. Fairfax County data shows similar occurrences. These do not constitute violations, however, since the Federal Standard has been rescinded and is considered only a guideline.

Suspended particulates do cause some concern. The DEIS 1976 Base Case substantially underestimated the Airport contribution according to Fairfax County data for annual particulate concentration. The 1990 projections made by the DEIS show increases in annual concentrations and increases in 24-hour concentrations. The Projected maximum 24-hour concentrations exceed the Federal Standard.

III. SUMMARY (continued)

In conclusion the Proposed Policy for Dulles International Airport will impact air quality differently for the four studied pollutants. Estimates show carbon monoxide will decrease, hydrocarbons will decrease, nitrogen dioxide will increase, and particulates may increase to the point of violation. Although the Airport may be responsible for only a portion of the increases, any contribution which deteriorates air quality to the level of violating Federal Standards should be given careful consideration.

The discrepancies between County monitoring data and DEIS data and the important questions of the derivation and inherent assumptions made by the DEIS should be resolved.


FAIRFAX COUNTY
Great Falls
Particulate
NO_2
Herndon
Particulate
Lewinsville
Particulate
CO
NO_2
HC
Vienna
Cub Run
Particulate
NO_2
Falls Church
Seven Corners
Fairfax City
Benchmark
Bailey's Crossroads
Massey
Particulate
CO
NO_2
Annandale
Ravensworth
Kings Park
Springfield
Westgate
Engleside
Lorton
Ocoquan Hill
Ft. Belvoir
AIR QUALITY AND METEOROLOGICAL MONITORING SITES
Continuous Monitoring Station
Sulfur Dioxide/Nitrogen Dioxide Bubbler
HiVol Particulate Monitor
Meteorological Station

Fairfax County Health Service

Response 1 - The airport-related concentrations reported in the Draft Environmental Impact Statement (DEIS), as well as the Final Environmental Impact Statement (FEIS), were the results of modeling utilizing the AVAP model. Model calibration was not feasible due to a lack of extensive monitoring data in the vicinity of the airports, therefore, a calibration factor of 1.0 was implicitly assumed.

Response 2 - The non-airport related concentrations presented in the DEIS were detailed in Appendix D, and reflected the most detailed and recent data available at the time of preparation of the DEIS. Future (1990) levels were estimated from existing data and COG projections. The FEIS incorporates 1979 monitoring data to update many of the 1976 non-airport related concentrations previously presented. See Appendix B in the FEIS.

Response 3 - The source of the motor vehicle emission factors was noted in the original DEIS. This data predated EPS's latest emission factor estimates, however, the emission factors utilized in this analysis accounted for the Clean Air Act Amendments of 1977. In order to keep the FEIS analysis consistent with the methodology utilized in the DEIS, these same factors were utilized. These factors account for the deterioration of vehicular emission control systems. The estimate of emissions did not include the effects of inspection and maintenance programs.

Response 4 - The suspended particulate levels presented in the DEIS and the FEIS were expressed as the original geometric mean. The tables in the FEIS have been updated to reflect this requirement of the Federal EPA National Air Quality Standards.

Response 5 - The 6 - 9 a.m. hydrocarbon concentrations presented in the FEIS have been presented as a guideline for compliance with the ozone standard.

Response 6 - The estimates of non-airport related concentrations for both airports in the DEIS were derived from several publications developed by COG. The FEIS utilized COG and Dulles EIS Master Planning Report projections. It has been assumed that these estimates were prepared with consideration of land use changes being taken into account.

AVIATION INDUSTRY

Comments and Responses

Air Transport Association ata OF AMERICA

1709 New York Avenue, N.W.
Washington, D.C. 20006
Phone (202) 872-4168

PAUL R. IGNATIUS
President and
Chief Executive Officer

April 14, 1980

Federal Aviation Administration
Office of the Chief Counsel
800 Independence Avenue, S. W.
Washington, D. C. 20591

Attention: Rules Docket AGC-24

Subject: Docket Nos. 19948 and 19950
FAA Notice No. 80-2

Gentlemen:

The Air Transport Association of America represents virtually all the scheduled airlines of the United States. We appreciate the opportunity to comment on behalf of our member airlines serving Washington National Airport on the Notice of Proposed Policy concerning Washington National and Dulles International airports, as well as the Notice of Proposed Rulemaking which proposes amendments to Subpart K of Part 93 and Subpart C of Part 159 of the Federal Aviation Regulations.

The enclosed comments represent the views of Air Florida, American Airlines, Braniff International, Delta Air Lines, Eastern Air Lines, Midway Airlines, Northwest Airlines, Ozark Air Lines, Pan American World Airways, Piedmont Airlines, Republic Airlines, Trans World Airlines, United Airlines, USAir, and Western Airlines.

We hope that these comments will prove useful to FAA in reaching a decision both as to its future policy and regulatory amendments applicable to Washington National. If we can answer specific questions or supply additional information we shall be pleased to do so.

Sincerely,

Paul R. Ignatius

Paul R. Ignatius

cc: Mr. Clark Onstad, Chief Counsel

COMMENTS OF THE AIR TRANSPORT ASSOCIATION ON DOCKET NUMBERS 19948 AND 19950 AND FAA NOTICE NUMBER 80-2

I. THE PROPOSALS

The Federal Aviation Administration ("FAA") is proposing changes to its operating policy at Washington National Airport. Concomitant changes are being proposed in two Federal Aviation Regulations--i.e., Part 159 which concerns Washington National and Dulles International airports and Part 93 known as the High Density Traffic Airport rule.

Essentially, FAA is proposing an amendment to Part 159 which would lift the prohibition against operations of two and three engine widebody aircraft at Washington National Airport and establish a so-called perimeter rule governing the non-stop stage length of flights to and from National Airport. FAA is also proposing a policy which would place a ceiling on the number of passengers served annually at National Airport.

Part 93 would be amended to shorten the scheduled operating hours and reduce the number of permissible hourly slots for certificated carriers. The number of slots removed from the certificated carrier quota would be transferred to the commuter quota, which would be redefined in terms of the capacity of the aircraft to be operated.

II. THE AIRLINE POSITION

Some of these proposals have merit; some do not. Others require substantial modification if they are to be adopted.

A. Deregulation and the High Density Traffic Airport Rule

In our submissions to FAA when the High Density Traffic Airport rule was being considered in 1968 we deplored resort to the

regressive concept of government imposed limits on aircraft operations, even as an expediency. We noted our fear that a solution based on restraints would divert attention from the basic problem--i.e., under-capacity--in both airport and airway systems.

Experience confirms that our concern was justified. Little has been done in the last ten years to assure that airport and airway capacity keep up with public demand for air transport services. Moreover, FAA has found it convenient to leave unchanged the quotas at the high density traffic airports during this time notwithstanding the improvements that have been made in the system. Ironically, this may be due in part to the success of the scheduling committees in adjusting their schedules in order to comply with the existing quotas.

In any event, we submit that ten years of artificially stunted growth at four major airports, including National Airport, are enough --that the time has come to free all four airports from these unnatural restrictions. At the very least, this experience calls into question the value of regulatory insinuation into what is essentially a problem to be solved in the marketplace, as is the case at all other airports in the United States. Standing alone this experience justifies rescinding or, at the very least, easing the existing limitations.

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We submit that the decision of Congress in 1978 to deregulate the airline industry emphasized the need for unrestricted access to the Nation's airports. By adopting the Deregulation Act, Congress and the President elected to let the marketplace decide the level of service to

1

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be provided at a given airport and to choose which carriers would provide it. Deregulation contemplates that some carriers serving specific airports will discontinue or reduce service at some of these airports, and some of those services will be picked up by other carriers, many of them commuter carriers. It is difficult to see how deregulation can work if access to four important airports is encumbered by restrictions such as those imposed by the High Density Traffic Airport rule, no matter who imposes them. 1

B. Quotas and Hours of Operations--Certificated Air Carriers

The High Density Traffic Airport rule did not predicate the 60 operations per hour at Washington National Airport on environmental concerns. The instant Notice, however, refers to aircraft noise as a reason for the proposed reductions in the certificated air carrier quota and the proposal to shorten the hours during which flights may be scheduled and operated. Specifically, FAA's proposal would reduce the air carrier quota from 40 per hour to 36 per hour from 7:00 a.m. through 8:59 p.m. It would limit to 18 the number of schedules between 9:00 p.m. and 9:30 p.m., after which time no flights could be scheduled into or out of National Airport. It would also close the airport to all operations after 10:30 p.m. except in emergencies.

Substantial amounts of public service between Washington and other communities could be adversely affected if this proposal is adopted. Some scheduled service to and from Washington might be lost entirely. In short, unnecessarily restrictive and regressive rule

changes are being proposed--changes which are certain to have a significant and negative impact on public service unless they are modified.

We recognize the importance of the airport's being a good neighbor as well as a servant of the Nation's travel and commercial needs. On the other hand, no convincing showing has been made that the proposed operational changes will provide sufficient environmental improvements to justify the deleterious impact on commercial activity and impingement on public service that would result if they are adopted. Nor, in our view, does it follow that recission or easing of the quotas would spawn additional operations in such numbers as to make the environmental impact unbearable. Such an outcome, we submit, is unlikely in the era of spiraling fuel costs in particular, and overall operating costs, in general. Moreover, lifting the prohibition on the operation of two and three engine widebody aircraft, the noise characteristics of which are less objectionable, must count as an environmental plus. 2

Nevertheless, if FAA is unwilling to rescind or ease the quotas at National Airport, and persists in an adjustment of the number of air carrier operations for environmental reasons, we submit that, in the practical sense, more meaningful noise relief is achievable, with fewer disruptions in the Nation's air transport system, through a carefully restructured rule that would permit a greater number of air carrier operations during those hours when the ambient noise level is high and reduce them when it is low. In many cases this will work to the mutual advantage of the airport's neighbors and its users. 3

As just stated, the certificated airlines believe that reducing their quota from 40 an hour to 36 with 18 scheduled operations permitted between 9:00 p.m. and 9:30 p.m., is the wrong way to obtain practical noise relief. A flexible and variable allocation of slots is a better approach. Such a restructuring can be accomplished without exceeding the total of 60 operations per hour. Moreover, it would recognize the more environmentally sensitive early morning and late evening hours, particularly on Saturdays and Sundays. The following table (Table I) sets forth our suggested revision of the quotas:

TABLE I

ATA SLOT ALLOCATION PROPOSAL

Mon-Fri	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	Total
Air Carrier	34	44	44	44	36	36	44	44	44	44	44	44	44	44	36 1/	618
Commuter	14	12	12	12	12	12	12	12	12	12	12	12	12	12	12	182
Gen. Aviation	12	4	4	4	12	12	4	4	4	4	4	4	4	4	12	100
Total	60	60	60	60	60	60	60	60	60	60	60	60	60	60	60	900

Saturday	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	Total
Air Carrier	32	40	40	40	36	36	36	40	40	40	32	32	30	30	30 2/	534
Commuter	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	120
Gen. Aviation	10	4	4	4	8	8	8	4	4	4	4	4	4	4	4	78
Total	50	52	52	52	52	52	52	52	52	52	44	44	44	44	44	732

Sunday	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	Total
Air Carrier	28	34	34	36	36	36	36	44	44	44	44	44	44	44	36 3/	584
Commuter	8	8	8	8	12	12	12	12	12	12	12	12	12	12	12	164
Gen. Aviation	10	4	4	4	12	12	12	4	4	4	4	4	4	4	12	98
Total	46	46	46	48	60	60	60	60	60	60	60	60	60	60	60	846

	Current Allocation	ATA Proposal	FAA (1)	FAA (2)
Air Carrier	4,480	4,216	3,654	3,654
Commuter	898	1,186	1,218	1,526
Gen. Aviation	1,344	676	1,218	910
Total	6,720	6,078	6,090	6,090

1/ 18 operations 9:00 p.m. to 9:29 p.m. 18 operations 9:30 p.m. to 9:59 p.m.

2/ 15 operations 9:00 p.m. to 9:29 p.m. 15 operations 9:30 p.m. to 9:59 p.m.

3/ 18 operations 9:00 p.m. to 9:29 p.m. 18 operations 9:30 p.m. to 9:59 p.m.

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As revealed by Table I, our proposal permits fewer weekly operations than proposed by FAA[4/]. That Table proposes a significant reduction in certificated carrier operations and provides for a substantial increase for the commuters. We recognize that it may be more complicated than the current rule; however, its advantages, both operationally and environmentally, outweigh any benefit deriving from simplicity of structure. For example, it recognizes FAA's objective of curbing the overall increase in the number of air carrier operations at National Airport and its perceived need to meet some of the environmental complaints. At the same time, it takes into account the importance of National Airport to the commerce of this area and its role as a vital transportation link to the seat of the Federal Government. 3

If our proposal is adopted, there will be no good reason to consider the more extreme measure of forbidding scheduled operations after 9:30 p.m. and closing the airport at 10:30 p.m. As previously stated, our proposal accepts a reduction of four certificated carrier slots, from 40 to 36 during that hour. It also would divide the 36 slots equally in half hour increments. By permitting no scheduling after 9:59 p.m. it would eliminate, as the FAA proposal would do, the possibility of up to 40 operations being scheduled exactly at 10:00 p.m.

4/ There are a total of 6,720 weekly slots currently available for all users of National Airport. Air carriers are allocated a maximum of 4,480 slots. Commuters are allowed 896 slots. The general aviation share is 1,344 slots.

Our proposal would also increase the commuter slots during the last operating hour to 12 which is more than proposed by FAA. This would avoid the waste of a valuable resource which can be used by a public carrier to provide public service.

The airline proposal entails even further reductions on the weekends, both during the morning and evening hours. Although the air carrier slots would range from 30 to 40 per hour through the day on Saturday, none of the hours would exceed 52 planned operations by all classes of users. On Sunday, as on Saturday, the total number of slots would be reduced significantly from the weekday levels. This is especially true in the morning hours.

Table I reflects that the general aviation quota would also be reduced both during the week and on weekends. In most instances, this reduction would be added to the commuter quota. At first glance, our proposal on the general aviation quota might appear more stringent than it really is. In any event, it is in keeping with what we take to be the generally accepted belief that any scarce resource should be allocated with a view of achieving the most efficient and public oriented use of that resource. In this connection, the relative efficiency of general aviation use of the airport and airway facilities as compared with the certificated air carrier and commuter use, is illustrated by comparing the respective passengers per operation carried by the certificated carriers, commuters and general aviation at National Airport. Table II makes this comparison for the period 1974 through 1979.

TABLE II

Calendar Year 1974 5/

Category	Total Passengers	Percent	Total Operations	Percent	Passengers Per Operation 6/
Air Carrier	11,197,116	95.7%	202,759	64.9%	55.2
Commuter	337,854	2.9%	34,591	11.1%	9.8
Gen. Aviation	171,058	1.5%	74,866	23.0%	2.3
Total	11,706,028	100%	312,216	100%	----

Calendar Year 1979

Category	Total Passengers	Percent	Total Operations	Percent	Passengers Per Operation 6/
Air Carrier	14,277,825	94.3%	207,112	58.7%	68.9
Commuter	632,567	4.2%	48,594	13.8%	13.0
Gen. Aviation	223,614	1.5%	97,198	27.5%	2.3
Total	15,135,017	100%	352,904	100%	----

The greater efficiency of use by certificated and commuter carriers becomes even more dramatic when a longer period (1972 through 1979) is analyzed. Table III makes those comparisons.

TABLE III

Calendar Year 1972

Category	Total Passengers	Percent	Total Operations	Percent	Passengers Per Operation 6/
Air Carrier	10,689,961	96.1%	218,984	66.1%	48.8
Commuter	250,002	2.3%	30,746	9.3%	8.1
Gen. Aviation	182,002	1.6%	81,699	24.6%	2.3
Total	11,121,965	100%	331,429	100%	----

Calendar Year 1979

Category	Total Passengers	Percent	Total Operations	Percent	Passengers Per Operations 6/
Air Carrier	14,277,825	94.3%	207,112	58.7%	68.9
Commuter	632,567	4.2%	48,594	13.8%	13.0
Gen. Aviation	223,614	1.5%	97,198	27.5%	2.3
Total	15,135,017	100%	352,904	100%	----

5/ Aircraft operations generally were lower in 1974 due to the fuel crisis.

6/ In the case of general aviation, crews are included in the passenger count; in the case of air carriers and commuters they are not.

The reductions we are proposing in general aviation operations would not reduce the percentage of slots available to that category below the percentage historically assigned by the High Density Traffic Airport rule at LaGuardia, an airport comparable in many ways to National Airport. Furthermore, the quotas tend to be absolute operational limitations for the certificated carriers and commuters who must operate on a schedule. On the other hand, general aviation is in a more flexible position since they are not bound in IFR weather to operate on a schedule. As FAA well knows, most general aviation aircraft requesting access to National Airport in VFR conditions have been accommodated. Illustrative of this point is the fact that while general aviation's quota represents 20 percent of the hourly slots, during 1979 general aviation activity accounted for 27 percent of all operations at National Airport. Virtually all of these operations occurred during the quota hours.

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C. Annual Passenger Limit

As pointed out above in discussing deregulation and the High Density Traffic Airport rule, the airlines believe that any artificial restraint on utilization of airports and airways is conceptually abhorrent. This is just as true of the proposed annual limit on the number of passengers at National Airport as it is of restrictions on the number of operations. Such a proposal, therefore, should be forthrightly rejected. 4

If, however, the 18 million total annual passenger figure proposed is to be used for planning purposes in connection with the

Comment No.

development of a master plan, the airlines believe that the planning figure should apply exclusively to passengers originating or terminating at Washington National Airport. Those passengers who are merely changing airplanes do not leave the terminal building complex. Therefore, they have no impact on the roadways, public parking lots, or curbside facilities. The aforementioned elements of the groundside facilities, rather than terminal buildings, are the ones most commonly cited as the areas of greatest congestion. This being the case, it does not appear reasonable to include connecting passengers in any total for planning purposes. 4

Additionally, the airlines do not believe that the FAA takes appropriate recognition of the increased use of the Metro rail system by passengers travelling to and from National Airport. By the end of 1979, approximately 18 percent of the passengers using the airport arrived or departed by Metro rail[7/]. As the Metro rail system is extended, and the costs of gasoline and other forms of ground transportation increase, there is little doubt that this percentage will increase markedly. These passengers, like connecting passengers, have minimal impact on the groundside areas at National Airport, a fact that must be taken into account when reaching a final decision as to the ultimate number of passengers to be included in the planning figure. 5

7/ The 18% using Metro rail is based on the total number of passengers using Washington National. If the total excluded connecting passengers, the percentage would be considerably higher.

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D. Redefinition of Commuter Aircraft

Of the categories of quotas established by FAA, two of them --certificated carriers and scheduled air taxis--refer to the economic operating authority of those carriers rather than the operational characteristics of the aircraft used in conducting operations. The "Other" category includes all general aviation operators. As we understand it, FAA would bring its rule into conformity with the changing operational characteristics of commuter aircraft.

6

The airlines believe that this change would be useful and support the proposal to redefine any transport category aircraft with less than 56 seats as a commuter for slot purposes, and to place such aircraft in the commuter quota category. However, we would like to stress the importance of re-examining this definition periodically and revising it as need be to reflect future changes in commuter aircraft size and configuration.

E. Two and Three Engine Widebody Aircraft

As mentioned above, FAA has restricted jet operations at National Airport to aircraft no larger than the B-727-200 model aircraft. It now proposes to change this policy and to permit operations of two and three engine widebody aircraft.

The airlines endorse the FAA proposal that two and three engine widebody aircraft be permitted at National Airport provided the airlines demonstrate the ability of these aircraft to operate into and out of the airport, and the capability of the airport to accommodate such aircraft.

7

F. Perimeter Rule

The 15 ATA member airlines now serving National Airport are not of a single view concerning the non-stop perimeter rule proposed for that airport. The majority are opposed to any limit; however, in the event a limit is to be established, of that majority 11 would favor the 1,000 mile alternative, while one airline would favor the current policy. Three other member airlines prefer maintaining the currer operating policy restricting non-stop flights to 650 miles with the exception of the seven "grandfather cities"[8/] within 1,000 miles of the airport. 8

G. Draft Environmental Impact Statement

As the FAA well knows, we continue to seriously question the validity of the model used by FAA in determining noise impact. However, without belaboring that point, we wish to emphasize that our alternative proposal represents a worthwhile reduction in the area covered within the 30 NEF contour. The environmental aspects must be weighed in the light of the overall public interest. In addition to the environmental relationship of Washington National Airport to segments of the metropolitan area, consideration must also be given to the maintenance of an adequate level of air transportation services to and from that airport and the economic impact of National Airport on the local community and the Nation. We submit that in the context of a balanced 9

8/ Minneapolis, St. Louis, Memphis, Orlando, Tampa, West Palm Beach, and Miami.

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judgement, our proposal offers meaningful environmental improvement and justifies its consideration by FAA. 9

III. CONCLUSIONS

These comments are filed on behalf of Air Florida, American Airlines, Braniff International, Delta Air Lines, Eastern Air Lines, Midway Airlines, Northwest Airlines, Ozark Airlines, Pan American World Airways, Piedmont Airlines, Republic Airlines, Trans World Airlines, United Airlines, USAir, and Western Airlines. They reflect the position of the airlines that the goals of national air transportation policy should be to provide the necessary airport and airway capacity to respond to valid public demand for service under airline deregulation, and to permit necessary scheduling flexibility to meet that demand. This is the case today at all but four U. S. airports, including Washington National. It should be the goal for all airports serving the public.

Washington National Airport is the most appropriately named airport in the United States. Its importance as the gateway to the Nation's Capital extends far beyond the Washington metropolitan area. It is a vital link in the Nation's air transport system meeting the demand of millions of citizens both here and throughout all parts of our country.

Under these circumstances, we urge that every effort be made to eliminate or ease restrictions at the Nation's airports including Washington National. In cases where restrictions are maintained they should be a rational response to the problem presented and reflect the need to maximize opportunities to meet public transportation demands.

We respectfully request FAA in acting on the above captioned proposals to adopt the recommendations set forth above.

Aviation Industry

Air Transportation Association

Response 1 - The scope of the MWA Policy effort does not include consideration of recinding or easing the existing total limits of the High Density Traffic Rule for the affected four airports. An MWA Policy will be consistent with the Deregulation Act of 1978 in that all air carriers and users will enjoy access into the Washington-Baltimore region. This region is fortunate in having 3 major airports to accommodate the area's air transportation needs. Any restriction placed on National will be balanced by the assurance of access through Dulles Airport into the region. The Deregulation Act did not eliminate the airport proprietor's responsibility in administering his airport(s).

Response 2 - The FEIS contains an environmental assessment of a range of policy options. The FEIS also contains an assessment of air service impacts among the various policy options.

Response 3 - The ATA proposal has been included in the FEIS as the Expanded Growth at National Airport alternative. The ATA proposal would provide no real measure of noise relief at National, except for not scheduling operations on the 10:00 p.m. minute. Compare the noise impacts of the Existing Conditions (1979) at National with the Expanded Growth Alternative and all other alternatives under consideration in the FEIS.

The ATA proposal would increase operations on the typical weekday and would not reduce operations on the weekends. In fact, it would permit moderate increases in weekend operations - not decreases. Weekends have historically had less activity than weekdays. For example in 1979 the air carriers used 588 slots per day on most weekdays, 496 slots on Saturday and 555 slots on Sunday. These levels do not include extra sections. The ATA proposal would have 626 slots on weekdays (Table 1 of the ATA letter has an additional error), 534 slots on Saturdays and 584 slots on Sundays. These levels do not include extra sections. Therefore, the ATA proposal would not reduce operations.

Response 4 - The option of no passenger limit at National is contained in the Expanded Growth Alternative and the No Change Alternative for National in the FEIS. In regard to the comment concerning the counting of originating and terminating passengers as the cap at National, such a proposal would place passenger levels approximately at those depicted in the Expanded Growth alternative.

Response 5 - The FEIS assumes that the Metro rail system will transport approximately 20 percent of originating or terminating passengers by 1990 at National.

Response 7 - The FEIS contains an assessment policy options that includes two- and three-engine wide body aircraft at National.

Response 8 - The FEIS contains an assessment of policy options that consider both of these perimeter alternatives.

Response 9 - The ATA proposal is assessed in the FEIS as the Expanded Growth Alternative. It would increase, not decrease, the area covered within the 30 NEF contour at National compared to the Existing Condition (1979). See the Noise Section for National Airport in the FEIS. The MWA Policy will balance the complex combination of competing interests that influence the two Federal airports, including the local concern regarding aircraft noise and the national concern regarding air service into the Nation's Capital.

Comments from the Airline
Industry other than ATA Comment

Comment No.

The Proposed Additional Restrictions Are The Result of Concerns Over Aircraft Noise Which Is Assumed To Be Associated With Scheduled Airline Operations

The general superficial perception is that airline operations at WNA are steadily increasing and that aircraft noise is increasing as a result. The additional restrictions which would reduce airline operations have been argued as necessary steps to counteract this. This general perception is not true. 1

Scheduled Airline Operations Have Not Been Increasing At WNA and Airline Noise Levels Are Decreasing and Will Continue to Decrease

Scheduled airline operations at WNA have not increased and are actually at a lower level than they were 20 years ago. In 1959 there were 230,000 scheduled airline operations. Last year there were 207,000. Airline aircraft noise levels are decreasing and will continue to decrease as quieter aircraft are added to airline fleets and noise reduction modifications continue to be made to present aircraft. 2

Total aircraft operations at WNA have increased, but this is not the result of scheduled airline operations. Should the overall noise level be increasing, it is the result of other operations at the airport not airline operation.

No justification exists for maintaining the existing 650-mile Perimeter Rule with the seven "grandfather" exceptions. The purposes for which this "informal" restriction were originally adopted may have had merit in 1966, but today -- 14 years later -- these purposes have been fully achieved. 3

The ATA is submitting comments which Piedmont supports. It strongly urges that the ATA proposal relating to the number and distribution of slots and hours of operation be adopted. However, of the FAA's final rule should reduce slots, it is Piedmont's position that it should also contain a provision setting aside the same number of slots for nonstop certificated service to cities within 300 miles of Washington National (excluding New York) as were utilized for this service on February 1, 1980. Under this proposal, 27% of the slots would be reserved for short haul service and the remaining 73% would be used to provide long haul service. In addition, the FAA should give consideration to a rule which assures that slot reductions will not unreasonably impair service to cities beyond 300 miles that now have a limited number of frequencies to Washington National. For example, the proposed rule should provide slots to maintain at least two roundtrips to Lexington Kentucky and three roundtrips to Louisville, Kentucky. 4

Comment No.

The cost of doing business at Dulles presents a significant barrier to full utilization of that airport. Until the cost between National and Dulles is eliminated or at least reduced, the incentive against shifting operations to the latter will thwart the FAA's objective of increasing Dulles' share of Washington metropolitan area passenger traffic. 5

The Airline Industry other than ATA Comments

Response 1 - The increase in noise at National under the No Policy Alternative (1990) is caused mainly by an increase in the air carrier mix of the B-727 aircraft. Compare the air carrier mix at National under Existing Conditions (1979) and No Policy Change (1990).

Response 2 - Air carrier turbojet operations cause the majority of aircraft noise impacts in the Washington area. The 230,000 airline operations at National in 1959 were piston aircraft while the majority of the 207,000 airline operations in 1979 were jets. The noise levels of the jets exceed the piston powered aircraft. As the B-727 increases its share of the air carrier mix at National, the noise problem will become worse. See Response Number 1 above.

Response 3 - See the Aviation Service sections of the FEIS concerning the elimination of the nonstop perimeter at National and the impact on Dulles. None of the policy options under consideration include the elimination of the perimeter at National.

Response 4 - The FEIS contains an environmental assessment of a range of policy options. However, none of the MWA Policy options deal with the allocation of air carrier slots among the separate users. The allocation of slots among users or cities will be considered in future proposed rulemaking. The FEIS summarizes the service impacts on cities among the various policy alternatives.

Response 5 - The FEIS contains an environmental assessment of a range of policy options. However, none of the MWA Policy options deal with cost differentials between National and Dulles. Once a policy is selected that defines a role for the two Federal airports, the issue of cost differentials can be explored.

Comment No.

Comments from the Commuter Airlines

The FAA's High Density Rule, established in 1969, has outlived its usefulness. Time, technology, construction and advanced FAA air traffic control procedures have eliminated the congestion of 1967-1968, which led to development of the rule. Today, the High Density Rule only serves to place an artificial constraint on the use of the four airports under the rule. 1

Commuters are in the business of feeding the passengers from the small communities into the hub airports for connecting flights. Consequently, commuters schedule their flights to arrive in time to deliver their passengers to the larger carriers and schedule their flights to depart for the small communities after the larger carriers arrive at the hub. At a minimum, commuter air carriers should be allowed an hour after 9:30 p.m. and before 7:00 a.m. to pick up and deliver passengers connecting to the larger carriers. 2

The precedent set by having a curfew at Washington National Airport is of major concern to CAAA because of the potential impact on all-cargo operations. While there are currently no all-cargo operations at National, the three other high density airports have extensive all-cargo operations. If these airports were closed to all traffic, except emergencies, during the evening, there would be a severe impact on the air cargo industry. 3

If the curfew is imposed for noise reasons, the CAAA urges the FAA to apply the curfew to "noisy" aircraft. Most of the equipment used by commuter air carriers is quieter than the jets. The level of noise produced by the aircraft should be the criterion for the curfew, not an arbitrary policy. 4

In light of this burgeoning growth, as well as the mandates of the Airlines Deregulation Act of 1978, the WNCAA strongly urges the FAA, at the very least, to adopt its Alternative B for DCA. This would increase commuter slots to 15 per hour, rather than the current woefully insufficient eight. 5

The WNCAA also requests that the FAA give most serious consideration to increasing commuter slots somewhat more.

Ransome's own supplementary position is that DCA should be open to commercial aircraft on a 24-hour basis, if such aircraft operations do not exceed the perceived noise decibel ("PNdB") footprint of a modern, "quiet" aircraft. In today's environment, local residents, consumers and commuter air carriers, in that order, are the focus for this proceeding. The opening of DCA to 24-hour quiet aircraft will serve each of the groups involved, with no derogation of the environment or safety. 6

The Commuter Airlines

Response 1 - See response to General Aviation Comment 6 which follows in this Appendix.

Response 2 - The FEIS contains an environmental assessment of a range of policy options. These options include various operating and scheduling provisions. However, none of the policy options reserve separate scheduling hours strictly for commuters. Such a provision could potentially discriminate against air carrier and general aviation.

Response 3 - Please see response to General Aviation Comment 1.

Response 4 - Please see response to General Aviation Comment 2. In addition, we know at this time of no valid sound level or criteria that divides noisy from non-noisy aircraft as applied to National Airport.

Response 5 - The policy option for increasing commuter slots at National to 15 per hour is not contained in the FEIS. However, the Controlled Growth and Reduced Activity alternatives provide for further increases to commuter slots as air carrier would be reduced over time.

Response 6 - One of the policy options under consideration would permit 24-hour operation of National Airport for propeller driven aircraft (No Policy Change alternative). In addition, see response to Comment Number 4.

Comment No.

Comments from General Aviation Interests

We are particularly concerned that any action taken by the FAA at Washington National Airport would set a precedent for other airport proprietors throughout the nation and could have serious effects on many operations on many operations that use the night hours to move essential cargo such as bank checks, mail, express packages and fresh foods across the country. The "domino" effect started at Washington with a curfew could be disasterous not only for aviation, but for the public at large. 1

A more effective and reasonable approach to controlling DCA nighttime operations can be built through the establishment of noise level limits based on FAR Part 36 noise levels. Aircraft which can be operated in compliance with the applicable FAR 36 noise levels should be permitted to use DCA at all hours. While this approach will not keep all aircraft from using the airport at night, it will ensure that the primary motive of the proposed curfew is realized -- that is, to reduce the environmental effects of National's operations through voluntary compliance by aircraft operators. The Administration fails to show, in either the proposed rule or the required Environmental Impact Statement, that there would be any benefit to the community from a curfew of general aviation flights at National Airport. The curfew would be far more than a mere inconvenience, and in fact would impose an unnecessary burden on the community. It would eliminate possible options of users and force them into a more crowded time period. 2

General aviation's smaller propeller-driven and quiet business jets do not produce the type of offensive noise that airport neighbors object to. A curfew to eliminate general aviation would gain little for the neighbors, but would do serious harm to interstate business and personal transportation. It would tend to compress all operations into fewer hours and thus increase the repetitive noise nuisance. 3

FAA appears to ignore the successful experiences and methods used by other major airports. Sound monitoring systems (which the FAA now has) are used to measure compliance with aircraft noise levels and operators not able to meet them are not permitted to use the airport. In addition, operational procedures are adjusted to reduce unnecessary aircraft noise. All of these methods have been utilized by airports such as New York-LaGuardia and Boston-Logan while operating within the 1976 Department of Transportation aircraft noise policy. 4

General aviation is not now receiving a resonable number of "confirmed" reservations. Only by picking up unused air carrier and air taxi slots can general aviation demands be accommodated at National. A reduction of general aviation slots will only further unbalance the allocation scale in such a way as to be in sharp contrast with FAA's founding statute, which states that all airports 5

Comment No.

receiving taxpayers' money must be open to all users on a fair and non-discriminatory basis. 5

The sixty (60) hourly IFR slots are out of date with real world operations and should be increased. While additional IFR and VFR operations may be approved by Air Traffic Control on a per request basis, the general aviation operator has no assurance that he will be handled. 6

The primary purpose of the proposed policy is to reduce noise and limit airline passengers using DCA, then more not less slots should be allocated to general aviation. General aviation activity is separated from the congested air carrier terminals. In addition, operations conducted by general aviation aircraft are significantly less noisy than those by air carriers. 7

General Aviation Interests

Response 1 - The FEIS contains a range of policy options. These options contain either a recommended operating curfew for National Airport or the existing voluntary operating practice during the nighttime hours.

A curfew at National would not result in the establishment of numerous curfews at other airports. The FAA reviews proposed restrictions by operators of Federally assisted (Airport Development Aid Program) airports to determine the impact of such restrictions as curfews on interstate and foreign commerce. A proposed restriction found to be an undue burden on interstate and foreign commerce would not be supported by FAA. An airport operator proceeding with a restriction or curfew opposed by FAA would run the risk of being held in noncompliance with existing Federal grant assurances. In the case of Washington National Airport, the existing low level of nighttime activity, coupled with the guarantee to hold Dulles open for continuous 24-hour service, will not result in an undue burden on interstate and foreign commerce. A curfew proposed by another airport operator, and supported by FAA, would in most cases require a situation almost identical to that which exists at National and Dulles. Therefore, a curfew, if enacted, at National would not result in numerous curfews at other airports.

Response 2 - The approach of using FAR Part 36 noise levels was considered in the 1978 DEIS for a proposed MWA Policy. It has advantages and disadvantages. It would provide for increased convenience to some general aviation turbojet operators by permitting them to operate at night from the National Airport.

However, one goal of an MWA Policy will be to maintain the existing nighttime quiet period at National. Historically, only 5 percent of daily operations (50 operations on the average) operate after 10:30 p.m. and before 7 a.m. The majority of these operations are by propeller aircraft. Permitting FAR 36 aircraft to operate at night will only fill this existing nighttime quiet period with jet operations in the coming years and add to the noise problem.

FAR 36 noise levels are for the certification of aircraft and should not be interpreted as acceptable to the people living around National Airport. In other words, people will consider a Stage 3 FAR 36 aircraft as less noisy than an uncertified jet of older design; however, they will not necessarily perceive a Stage 3 jet as acceptable during the late night hours where there is currently little, if any, such activity. A FAR 36 provision could fill the existing vacuum of operations at night around National and increase the noise problems.

A curfew at National, if enacted, would impact a very limited number of general aviation operations (10 to 20 per night), and Dulles and BWI would be open 24 hours for continuous service to accommodate late activity.

Response 3 - A curfew, if enacted, would affect a very small proportion of general aviation operators at National Airport. As an example, of the 250 to 350 g.a. operations per day (weekdays) at National, only about 10 to 20 operate after 10:30 p.m. and before 7 a.m. Moreover, there are two other alternative airports in the region (Dulles and BWI) that will remain open for continuous 24-hour operation. A curfew at National would give local residents a period of calm every night. It would not seriously harm interstate business and personal transportation, given the fact of the current low level of activity during the nighttime hours at National and the availability of two other major airports open for continuous 24-hour service.

Response 4 - The noise monitoring system for National and Dulles provides an excellent tool to evaluate and test alternative flight paths and procedures at the two airports. However, we believe it should not be used to measure compliance with a selected operating noise standard. This could result in a beat-the-meter routine by some pilots and little true noise abatement. It is a goal of an MWA Policy to maintain the existing quiet period during the nighttime hours at National.

Response 5 - The Washington-Baltimore area is fortuate in having 3 major airports and additional general aviation facilities to serve the region's air transportation needs. An MWA Policy will not discriminate against users in that access into the area will not be denied to users. Any restriction at National will still permit access into the area through Dulles or any of the other regional facilities.

Response 6 - All policy options under consideration would maintain the sixty (60) hourly IFR slot total for National Airport. The Washington-Baltimore area is fortunate in having 3 major airports and additional general aviation facilities to serve the region's air transportation needs. Two of these major airports, Dulles and Baltimore-Washington Airport, are relatively underutilized and have the potential to accommodate major increases in growth over the next decade. National Airport, on the other hand, has significant environmental and landside facility problems that precludes unlimited future growth. The increase in IFR slots at National would only compound the existing problems at that facility.

Response 7 - Some of the policy options (Controlled Growth and Reduced Activity) under consideration in the FEIS would roll back air carrier slots at National over time and allocate these slots to commuter and general aviation. Therefore, slots available to commuter and general aviation would increase over current levels.

Comments from the Airline Passengers Association

The Airline Passengers Association, Inc. proposes the following policy for National Airport which should satisfy most of the needs of local residents and airline passengers:

1. Perimeter

Eliminate any perimeter restriction, thereby allowing nonstop flights to any point within the operating range of aircraft permitted to serve Washington National Airport.

2. Aircraft Limitations

Two and three engine wide body aircraft would be permitted in addition to those aircraft currently allowed. New aircraft such as the Boeing 767 and 757, and the Airbus A310 should also be permitted when available.

3. Slot Allocation

Air carrier - 32 "schedules" per hour, plus extra sections, (a reduction of 20% in available slots); Commuters - 15 "schedules" per hour (an 87 1/2% increase); General Aviation - 9 per hour (a 25% decrease). Slots are reduced by 50% from 9:00 - 9:30 p.m. Slots not used during any hour for six months are permanently lost.

4. Operating Hours

7:00 a.m. until 10:30 p.m. Closed to all traffic except emergencies, 10:30 p.m. until 6:59 a.m.

5. Scheduling Hours

Scheduling hours for air carriers and commuters 7:00 a.m. until 9:30 p.m.

6. Passenger Limit

No annual total passenger limit at National Airport.

Airline Passengers Association

Response 1 - The FEIS contains an environmental assessment of a range of policy options. The elements of the APA proposal are contained within the various policy options with the exception of the elimination of the perimeter at National. In regard to eliminating the perimeter, see the discussion in the Air Services section of the FEIS for Dulles.

LOCAL BUSINESSES and CHAMBERS of COMMERCE

Comments and Responses

Comments from Local Business and Chambers of Commerce

We would like to see the FAA proceed with the master plan to improve the complete facilities at National Airport that is long over due and as Secretary Goldschmidt said is a discrace to our Nation's Capital. Let's do something about it now. 1

We would like to see schedule flights allowed to land at Washington National Airport regardless of the time, since the number is relatively small it would have very little impact. The inconvenience caused to the traveling public, our customer, would be severe. He could find himself at either Baltimore-Washington International or Dulles International Airports and a guaranteed reservation in one of our hotels here in Washington and a long trip to try to make to keep reservation at one of our hotels here in Washington. 2

Three engine wide body aircraft should be permitted at National Airport, but only on the basis that two conventional jet slots must be eliminated for each wide body aircraft slot added regardless of other reductions in slots imposed by this policy statement. 3

While the Economic Development Authority is a strong advocate of the transfer of air carrier and commuter aircraft flights to Dulles Airport, it believes that this is most certainly an appropriate time to assure that the environmental concerns which have prompted the current DEIS consideration with respect to National Airport do not overtake Dulles Airport. Fairfax County has shown determined leadership in the effort to protect sensitive approach areas and other areas adversely impacted by aircraft noise at Dulles. Missing are clearly defined federal guidelines which Fairfax County can assure are legally defensible if it is going to use them as criteria for making land use planning determinations adjacent to Dulles Airport. Such assistance on the part of FAA will ultimately serve FAA's best interests as well as those of the County. Every effort must be made to avoid the necessity of the type of environmental assessment at Dulles Airport which is now occurring at National. 4

In general, FAA should provide service preference incentive to those airlines which use aircraft which meet or exceed federal standards for aircraft noise.

These airlines should be given preferential treatment for their flights using "quiet" aircraft in terms of service slots at National and in terms of physical location of access gates, etc. Effective efforts on the part of the airlines to combat the aircraft noise problem at National should be rewarded. 5

To assure the most efficient and convenient level of accessibility, the following transportation access demands must be included in the Metropolitan Airports policy: 6

Comment No.

(1) The parallel lanes in the Dulles Highway corridor must be built to provide a high level of accessibility to business firms which will locate in the areas provided for business and industry by Fairfax County, and to serve current residents.

(2) The Dulles Highway extension from Virginia Rt. 123 to I-66 must be completed even in the face of deep federal budget cuts. At the current rate of escalation of highway costs, the only cost-effective solution is to complete the project as soon as possible. 6

Improve ground transportation connections between Dulles and National Airports, and the numerous intermediate points which are now poorly served. Difficulty in making connecting flights when one is at Dulles and one is at National must be minimized. Service from hotels and other key collection points between Dulles and National Airports needs to be substantially improved. 7

Encourage Washington METRO officials to continue to plan for expeditious extension of the basic METRO system to Dulles Airport. Such service should provide direct and convenient access to the terminal buildings at both airports.

Local Business and Chambers of Commerce

Response 1 - Once a policy is adopted that defines the role of Washington National Airport, the master planning and eventual rebuilding of the facility will take place.

Response 2 - The policy options in the FEIS contain various scheduling and operating periods for the air carriers and any major problems of this type under any of the policy options. Given the existing scheduling and operating practice of the airlines, all policy options provide sufficient time to conclude scheduled activity. Frequent diversions are not anticipated under any policy options.

Response 3 - The use of two- and three-engine wide bodies at National is under consideration in the MWA Policy effort. However, should a decision be made to admit these aircraft under an MWA Policy, it will not be on a one-for-two basis. Such a provision would be a disincentive for the airlines to use wide bodies at National. Encouraging the use of these aircraft on the one hand and then penalizing an airline for introducing wide bodies does not make sense.

Response 4 - The MWA Policy effort will define the regional roles for Washington National and Dulles International Airports. Once a policy is adopted, the master planning and land use/airport environs study can be completed for Dulles Airport. The land use issues raised can then be addressed with a firm policy in place.

Response 5 - The airline fleets will all meet existing noise standards under FAR Part 36 in the coming years. This has been mandated under Federal law. The recommendation alone would do little to change the noise environment at National.

Response 6 - These proposed actions are independent of the Metropolitan Washington Airports Policy effort.

Response 7 - Once a role for Dulles is established by an MWA Policy access will be added as necessary to fulfill that role. Improved access without a supporting policy will accomplish little.

CITIES, AIRPORTS and CHAMBERS of COMMERCE outside of the Washington area

Comments and Responses

Comments from Cities, Airports and Chambers of Commerce Outside of the Metropolitan Washington Area

Comment No.

This is to register our strong objection to the proposed 18% reduction of airlines' use of Washington National Airport.

Business people in our state save considerable time and expense in their vital trips to our Nation's Capital by utilizing Washington National rather than Dulles International or Baltimore-Washington International.

We contend the air carriers are becoming better community neighbors through the utilization of newer and quieter aircraft and special abatement operating procedures. 1

The desires of those who would severely curtail airline traffic at Washington National should be balanced against the needs of citizens of other parts of the country, to provide maximum availability to our Nation's Capital.

Extending the nonstop perimeter to 1,000 miles would improve access to the Nation's Capital without placing any appreciable environmental burden on the surrounding community. In view of the foregoing, we recommend that you define the nonstop perimeter for National at 1,000 miles. 2

The existing nonstop perimeter should remain unchanged. 3

The suggested bid auction process will certainly hurt the short haul markets. It's obvious that the longer routes flown by larger aircraft will bring the higher bids. This will add to the decreased service for communities whose distances cannot support a high bid. 4

Cities, Airports and Chambers of Commerce Outside of the Metropolitan Washington Area

Response 1 - The FEIS contains an environmental assessment of a range of policy options. The MWA Policy will balance a complex combination of competing interests that have influenced the two Federal airports. The FEIS summarizes the anticipated air service impacts of the policy options to cities across the country.

Response 2 - The FEIS contains policy options with a 1,000 mile perimeter.

Response 3 - The FEIS contains policy options with the existing 650-mile perimeter plus the seven "grandfather" exemptions.

Response 4 - None of the policy options under consideration for an MWA Policy contain this provision.

Comments from Public and Private Organizations from Birmingham, Alabama

It is extremely important to us in Birmingham that direct air service between our airport and Washington National be established and maintained. The fact that we are three miles outside of the 650 mile perimeter that has been established is not a valid reason for not providing service.

Public and Private Organizations from Birmingham, Alabama

Response 1 - The FEIS provides an environmental assessment of a range of policy options for Metropolitan Washington Airports. Some of these policy options contain a provision for extending the nonstop perimeter for National Airport to 1,000 miles.

Comment No.

Comments from the Norfolk Port and Industrial Authority

The existing limitations on use of Washington National Airport are the result of political, rather than economic, decisions. Curfews and arbitrary non-economic and non-engineering limitations on aircraft movements are antithetical to the principle of maximizing efficiency in terms of the value delivered to the consuming public. 1

There is no truth to the conclusion shown in Draft EIS Table V-1A that passengers will redistribute themselves among the three Washington-Baltimore airports if access is denied to Washington National. Instead the majority will either drive or cancel their trips. 2

The market is smarter than any of us, including the FAA policy planners. The travelers know what they need, what they can use as practical alternatives, what their time is worth, and what getting to Washington is worth, in the real sense of what is reasonable for them to do when faced with all complexities of a choice. These market values are not reflected in the draft EIS. 3

Norfolk Port and Industrial Authority

Response 1 - The FEIS contains an environmental assessment of a range of policy alternatives. The MWA Policy will balance a complex combination of competing interests, including economic and air service interests, that influence the two Federal airports.

Response 2 - There may be some use of alternative modes of transportation or cancelled trips for cities close to the Washington area, such as Norfolk, for some of the policy alternatives under consideration. However, this would not be true for the vast majority of air passengers using the three regional facilities for any of the policy alternatives. The majority of air travelers will continue to use the three regional facilities. See the Aviation Forecast and Aviation Service sections of the FEIS.

Response 3 - The FEIS contains an environmental assessment of a range of policy alternatives. The environmental impact statement alone is not the sole basis for selection of an MWA Policy. Factors, such as economic impacts, will be considered prior to a policy selection.

Comment No.

Comments from the City of Houston and the Houston Chamber of Commerce

The City of Houston and the Houston Chamber of Commerce ("Houston") strongly oppose the implementation of any nonstop mileage restriction at National Airport. However, if the DOT/FAA are determined to impose a perimeter rule, Houston proposes an alternative rule that will fully meet the FAA's stated objectives and, at the same time, minimize the legal infirmities of the FAA's current proposals. Such a rule should be based on the maximum nonstop stage length at full payload of the aircraft types currently operating at National Airport; which equates to about 1,500 miles. 1

By unnecessarily invading and infringing carrier management decisional perogatives, the perimeter rule patently violates the Federal Aviation Act as amended by the Airline Deregulation Act of 1978 which required the CAB and the DOT/FAA to rely "to the maximum extent possible" on the disciplines of the competitive marketplace and not on the heavy hand of federal regulation. 2

The 650-mile rule has not made National Airport a short- or medium-haul airport. National Airport serves the same long-haul markets that Dulles serves and in many cases with substantially more frequencies. 3

The existing perimeter rule has not resulted in shifting service and/or traffic from National Airport to Dulles Airport. However, assuming arguendo that such redistribution has occurred and further that such redistribution was in the public interest, Dulles International has long since past the time when its growth and development need protection. 4

City of Houston and the Houston Chamber of Commerce

Response 1 - The FEIS contains an environmental assessment of a range of policy alternatives. However, none of the policy options under consideration consists of completely eliminating the nonstop perimeter of National Airport. See the Aviation Service section of the FEIS that discusses the impacts of the elimination of the nonstop perimeter at Dulles. A 1,500 mile perimeter at National would result in impacts at Dulles similar to a no perimeter option at National.

Response 2 - None of the MWA Policy alternatives under consideration would exclude nonstop Houston-Washington service into two of the three airport facilities in the Washington-Baltimore region. The Deregulation Act of 1978 was concerned with access into a city or region not a specific airport. The Deregulation Act did not strip an airport proprietor of all authority in administering his airport(s).

Response 3 - The existing perimeter practice at National has maintained the relative short- and medium-haul role for National and the long-haul role for Dulles. These roles represent the flow of passengers between Washington and cities across the country, not the routing of aircraft. The majority of passengers traveling within 650 miles of Washington use National, while the majority of passengers traveling greater than 1,000 miles from Washington use Dulles and Baltimore-Washington Airports. See the Aviation Service sections of the FEIS regarding the elimination of the perimeter at National.

Response 4 - The nonstop perimeter rule at National was established in an effort to enhance the role of Dulles as the region's long-haul airport. This is, in fact, the case as Dulles traditionally has had more long-haul nonstops than Baltimore-Washington, and since it is the region's primary international airport.

It is no less a fact that the past year has seen a dramatic shift of activity away from Dulles as a result of a poor National economic climate and the reduction in use of B-707 and DC-8 aircraft because of fuel consumption. This can be noted from Tables III-18 and III-37 in the FEIS. While activity has also dropped at National and Baltimore-Washington in this same time frame, the loss at Dulles is much more alarming.

Further evidence of the need to protect Dulles is the recent transfer of Ozark Airlines of their Dulles operations to Baltimore-Washington. Delta Air Lines has also recently closed its Dulles station but has not, as yet, increased service to Baltimore-Washington.

Maintaining a perimeter (either the present agreement or an extension to 1,000 miles) is expected to strengthen in time the role Dulles plays in the region's air transportation system. Elimination of the perimeter is not considered realistic as it would most likely result in a loss of nearly 37 of the approximately 86 nonstop domestic flights per day (or a 43 percent

immediate daily flight reduction) at Dulles.[1]

Elimination of the perimeter would leave only Seattle, Los Angeles, San Francisco and San Diego as the primary domestic activity at Dulles. Should any of the the carriers move this remaining service to Baltimore to combine it with existing activity at that airport in the interest of reducing costs, Dulles would lose all its domestic traffic until the mid or late 1980s depending on the restrictions placed in National. This would be a most serious and unexpectable outcome for the Washington-Baltimore region.

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[1]The most likely cities affected would be: Denver (10 flights), Dallas/Ft. Worth (9 flights), New Orleans (2 flights), Tulsa (2 flights), Austin (2 flights), Houston (6 flights), Salt Lake City (2 flights) and Kansas City (2 flights). Cities further away than Denver were not considered here because it was determined that, because of the short runway at National (6,870 feet), the approximate maximum range for a 727-200 from National would be 1,500 miles. The maximum range for the two- and three-engine wide bodies permitted to use the airport under the several policy alternatives is around 2,000 miles. Calculations for both aircraft categories were based on a mean maximum temperature of 88.2°F and assumed 90% load factors. However, there would always be the potential to fly nonstop from the West Coast and land at National with return service stopping once for fuel.

LOCAL CITIZEN GROUPS and the GENERAL PUBLIC

Comments and Responses

Comments and Responses from Local Citizens Groups and the General Public

Comment 1 - The original DEIS/March 1978 and the Supplemental DEIS/January 1980 do not speak to the vital issue of human safety - safety of airplane crews and passenges aboard aircraft in proximity to Washington National Airport and safety to the general public in the built-up residential and commercial areas of Washington and the Maryland and Virginia suburbs.

Response 1 - The first priority of the FAA is safety. The safety record for the operation of National Airport is excellent. All policy options under consideration are equally safe. Safety comes before any consideration of an MWA Policy.

Comment 2 - Virginians for Dulles has strongly supported, and continues to support, the Council of Governments (COG) recommendations as the basic framework on which a new and rational operational policy for National should be based.

Response 2 - The FEIS contains a policy option that represents the COG recommendations under the Reduced Activity Policy for National.

Comment 3 - In this connection, we stress that current aircraft noise levels from National Airport air traffic are far in excess of the noise levels established by the Environmental Protection Agency (EPA) as necessary to protect public health and welfare. In fact, the Supplement does not appear to give any weight whatsoever to the relevant EPA noise standards.

Response 3 - There are no federal noise standards for the operation of an airport. The EPA has published a "Levels Document," however, this document specifically points out that its contents do not constitute agency regulations or standards.

Comment 4 - As regards air pollution, we further protest the fact that, under the proposed FAA policy, airport-related emissions would increase at and around National above existing levels, due in large part to the great increase in surface transportation necessitated by FAA's recommended increase in passenger use of National. Several air pollution standards adopted pursuant to the Federal Clean Air Act would be violated, and hydrocarbon violations would continue to occur at all receptor points at National.

Response 4 - The FEIS provides the air quality impacts of the policy options under consideration.

Comment 5 - Since FAA's operational policies are responsible for having turned "close-in" National Airport into one of the most intensively used airports in the world, a study of the effects on human health and welfare in the areas impacted should be a minimum requirement in order for the Supplement to the Draft Environmental Impact Statement to be considered in compliance with the National Environmental Policy Act. The Supplement fails to consider these

matters even in the most rudimentary fashion, even though there is much new evidence available regarding the adverse physiological and psychological health impacts of noise exposure above levels set by EPA standards.

Response 5 - There are no EPA standards regarding noise from aircraft using an airport. The Draft Environmental Impact Statement of March 1978 for a proposed MWA policy contained an FAA publication "Impact of Noise on People." This publication was referenced in the Supplement to the DEIS and is available from Director, Office of Environment and Energy, Federal Aviation Administration, 800 Independence Avenue, Southwest, Washington D.C. 20591.

Comment 6 - With regard to the two alternative policies which FAA proposed for the operation of National - one being the so-called "Restricted Growth Policy" and the other the so-called "Expanded Growth Policy" - it is impossible to consider these policies as true alternatives.

These two policies are in part totally inconsistent with and contradictory of the viewpoints they are supposed to represent. As indicated above, the "Restricted Growth Policy," which purports to represent the views of those who want use of National reduced, in fact proposed a larger airport with substantially higher passenger levels and permits nighttime operations at National, whereas under the "Expanded Growth Policy" the curfew would be strengthened and night flights reduced.

Response 6 - The Restricted Growth Policy in the Supplemental DEIS was constructed from comments of the Metropolitan Washington Council of Governments (COG) to the DEIS of March 1978. Those comments did not propose a schedule rollback or curfew at National Airport. The FAA proposal in the Supplemental DEIS proposed such provisions as part of a policy. When COG made no proposal in these areas, the existing operating practice was adopted to complete the environmental analysis and noise modeling. COG adopted the schedule rollback and curfew proposal of FAA in its latest comments on the Supplemental DEIS and these provisions have been added to the COG recommendation shown as the Reduced Activity Policy at National in this FEIS.

The Expanded Growth Policy was taken from comments from the airline industry. These comments contained a schedule rollback, but no absolute operating curfew for National.

Comment 7 - With regard to FAA's Proposed Policy for operations at National, we conclude that this plan fails to provide the noise relief required for a decent living environment in the Washington metropolitan community. While the Proposed Policy offers immediate improvement in noise impact during nighttime hours, it moves any substantial relief during daytime hours many years into the future. By arbitrarily setting passenger limits far too high, it assigns to National Airport the role of primary airport for the

Washington area during the next 20 years. This is not only unnecessary, unreasonable and damaging to the welfare of the metropolitan community, but it violates the rules that FAA itself has laid down for the operation of close-in airports elsewhere in the United States.

Response 7 - The FEIS contains an environmental assessment of a range of policy options. The FAA does not have separate rules for the operations of close-in airports.

Comment 8 - Virginians for Dulles, therefore, recommends:

(1) that the proposed policy's reduction in air carrier slots from the current 40 to 36 be considered a first step to be followed annually by further slot reductions, so as to reduce air carrier operations per hour from its current 40 to 20 by 1985. These slot reductions should be achieved in part by the introduction of wide bodied jets on a 2 for 1 basis and by perimeter restrictions involving cancellation of the exemption for the "grandfather" cities and adoption of a true 650-mile perimeter limiting flights to and from National Airport to points within that perimeter;

(2) that the proposed policy's plan for reduction of air carrier scheduling and operations during evening and nighttime hours be adopted;

(3) that commuter carrier operations be increased from 8 to 12 per hour and general aviation operations be continued at 12 operations per hour;

(4) that the annual total passenger level be limited so as not to exceed 14 million.

(5) that "extra sections" of scheduled shuttle service be included in the total limit on air carrier operations;

(6) that a Regional Advisory Board be established to deal with aviation policy questions in the metropolitan area, so that the views of the residents may be properly represented in the decision making process; and

(7) that the Department of Transportation find the funds to connect Dulles by rail to the Metro rail system on an urgent basis.

Response 8 - This policy recommendation is almost the same as the Reduced Activity Policy at National which is under consideration. However, if wide body aircraft are admitted to National Airport, it will not be on a one-for-two basis. Such a provision would be a disincentive to use this equipment, not an incentive. The Regional Advisory Board will be separate from an MWA policy. Once a role for Dulles is defined by an MWA policy, necessary access will be added to assure the success of the policy.

Comment 9 - Specifically, CAP calls for the following:

(1) An immediate end to "growth" at WNA. Passenger and jet operation levels have been permitted to reach dangerous levels as this debate has dragged on through the years. An immediate growth freeze at WNA is essential while a new policy is phased-in.

(2) A 50 percent reduction in jet slots. No meaningful noise relief can be attained without a reduction of at least 50 percent of the commercial jet operations at WNA. This view is shared by the Metropolitan Washington Council of Governments (COG), virtually every area jurisdiction, hundreds of citizens' organizations in the region and tens of thousands of residents who live with WNA now. The reduction could be comfortably phased-in in three years time.

(3) Curfew. The FAA curfew proposal is a sound one which should be adopted as proposed, thus eliminating all late evening and night jet operations and reducing the "bunching" of operations at the end of the scheduled day. The 7:00 a.m. morning ban should be extended to 8:00 a.m. on weekends.

(4) Mandatory noise abatement techniques. No policy consideration has been given to operational techniques which could assist in noise abatement. These include the Air Transport Association's (ATA) recommended climb mode; deferring the reapplication of full power on takeoff to 15 miles DME; and an increase of required glide slopes on descent, consistent with safety considerations.

(5) Citizen's Advisory Committee. It is an accident of history that the residents of the Washington region have no say in the operation of their airports. A Citizen's Advisory Committee - with participation by affected citizens' organizations, as well as COG and the FAA itself - is needed to permit the continuing development of rational airport planning policy for WNA and to help generate the stability in operation of that airport which has been lacking during the past decade of lawsuits, legislation and politicking for policy change.

(6) Restricted introduction of wide bodies. Wide bodied aircraft should be introduced at WNA - assuming, as FAA does, that safe operation can be established - only on a one-for-two basis. Airlines should be required to remove two narrow bodied jet aircraft for every wide body they introduce. FAA's own statistics show that wide bodies are not significantly quieter than the 727-200s and DC-9s which use WNA now. Wide bodies reduce noise only if they take more aircraft out of the sky than they add.

(7) Better access to Dulles. Changes in regional residential and work patterns have made IAD far more convenient to use - if flights were available there. However, better access is plainly needed. Long-term, high speed rail is the answer; in the short run, I-66 linkup, improved bus service and helicopter service should be considered.

(8) Retention of the 650-mile limit. Increasing the stage length at WNA to 1,000 miles only exacerbates the pressure for more operations at WNA. Birmingham, Houston and New Orleans pressure for service to WNA, but such pressure is the very reason to retain the present perimeter; it is not service to Washington that they are denied, it is only the requirement that they use IAD or BWI. The "grandfather" status of seven cities outside the present perimeter does not justify making a bad situation worse.

(9) Development of equitable flight paths. FAA has completely sidestepped the issue of flight paths in developing airport policy. The unavoidable fact remains, however, that the planes - however many there are - must fly somewhere, and where they fly can make a great difference in their noise impact. CAP strongly endorses the concept of a broad-dispersal flight path, like that used at virtually all other American airports. In recommending such flight paths for WNA, however, CAP emphasizes that flight path policy changes in no way mitigate FAA's obligation to establish a more rational overall airport operational policy.

Response 9 - This policy recommendation is almost the same as the Reduced Activity Policy at National which is under consideration. See the FEIS. However, consideration of alternative flight paths, flight procedures and the Citizen's Advisory Committee is proceeding independently of the MWA policy effort as a joint FAA-COG program. Access will be added to Dulles as necessary to enable it to assume the role designated by the MWA policy. The new generation of two- and three-engined wide body aircraft are noticeably less noisy, especially on takeoff, than the current fleet of commercial jets using National. See the Noise section of the FEIS. Should wide body aircraft be admitted at National, it would not be on a one-for-two basis. Such a proposition would be a disincentive, not an incentive, to these aircraft.

Comment 10 - The SDEIS provides the benefit of the FAA's proposed curfew to FAA's favored policy. This eliminates late night, post 10:00 p.m. operations and thus eliminates the 17x "penalty" which would extend the NEF contour much farther. However, in considering more restrictive policy alternatives - less growth for WNA - FAA has not provided the same benefit. Instead, FAA has assumed that late night flights will continue as they do now, thus imposing upon this alternative the gross computational penalty of the many nighttime operations currently using WNA.

Response 10 - The schedule rollback and operating curfew are FAA proposed alternatives. The Restricted Growth Policy in the SDEIS was constructed from comments of the Metropolitan Washington Council of Governments (COG) submitted in March 1978 in response to the DEIS. Those comments did not propose a schedule rollback or curfew at National. When COG made no proposal in these areas, the existing operating practice was adopted to complete the environmental analysis and noise modeling. COG adopted the schedule rollback and curfew proposal of FAA in its latest comments on the SDEIS

and these provisions have been added to the COG recommendation shown as the Reduced Activity Policy at National in the FEIS.

Comment 11 - NEF is a questionable analytical tool in assessing the noise impact of WNA: it assumes a 24-hour per day operation and, like Ldn which preceeded it in 1978, NEF averages noise impacts.

Response 11 - In addition to the cumulative noise metrics of Ldn and NEF, the Time Above metric has been used in all of the environmental documents. This metric employs no averaging of sound energy.

Comment 12 - The NEF contour as depicted in the SDEIS is understated by nearly 40 percent.

Response 12 - See page III-6 of the SDEIS. The monitoring data from the Aircraft Noise Monitoring System, together with the latest aircraft data, were used to "fine tune" the noise model to closely reflect actual measured data. There is no evidence that the noise contours are understated by 40 percent.

Comment 13 - The SDEIS again completely ignored the noise impacts of WNA on suburban Maryland and Virginia.

Response 13 - The SDEIS and this FEIS have assessed the noise impacts resulting from aircraft using Washington National Airport. In addition, the FEIS shows the impacts of the policy options under consideration. The noise descriptors have been used correctly and accurately to depict the impacts in Maryland and Virginia.

Comment 14 - The DEIS and SDEIS does not assess the impact of air pollution from aircraft in the Potomac River corridor using National.

Response 14 - These documents and the FEIS assess the air quality impacts of various policy options at National. The air quality model has been used correctly and accurately to assess air quality impacts. At distances remote from the airport, the ability to reliably identify aircraft-related emissions drops significantly. Essentially, the combination of aircraft speed and altitude dissipate aircraft-related gases (emissions) to the point that it becomes difficult, if not impossible, to reliably identify aircraft-related emission concentrations at ground level.

Comment 15 - The DEIS and the SDEIS continue to overlook the impact of aircraft noise beyond measurement of decibel levels and plotting of noise contours.

Response 15 - The DEIS contained and the SDEIS and FEIS reference an FAA publication "Impact of Noise on People" available upon request to the Director, Office of Environment and Energy, Federal Aviation Administration, 800 Independence Avenue, Southwest, Washington D.C., 20591.

Comment 16 - There is no meaningful comparative impact evaluation in the Environmental Impact Statement regarding historic and 4(f) lands, traffic access and noise impacts.

Response 16 - The Environmental Impact Statement assesses the impact of a range of policy options in these disciplines.

Comment 17 - The "Restricted Growth" alternative does not "reflect the local perspective," as indicated in the SDEIS; it is almost the diametric opposite of regional will.

Response 17 - The Restricted Growth alternative was constructed from comments provided by the Metropolitan Washington Council of Governments (COG) to the March 1978 DEIS. See response to Comment 10 above.

Comment 18 - The proposed reduction in commercial air carrier slots from the present 40 per hour to 36 per hour, with future possible reductions if aircraft mix and passenger volume warrant, is simply not enough of a step in the right direction to effect any of the noise relief which is intended.

Response 18 - The FEIS contains an assessment of the noise impacts of the policy options under consideration. The noise impact at National for each policy option is detailed and number and mix of aircraft resulting from each policy option is shown.

Comment 19 - FAA's policy would impose no further restraints on WNA growth until 18 million passengers per year squeeze through its outmoded facilities. This represents an 80 percent increase over the passenger levels of 1975, when WNA was already one of the most overcrowded airports in the United States; it represents nearly a 20 percent increase over today's intolerable levels. WNA must not be allowed to continue to grow.

Response 19 - The FEIS contains a range of policy options under consideration including an option that reduces passenger levels at National below existing (1979) levels.

Comment 20 - Wide bodied jet aircraft are arguably louder than the conventional jet aircraft which presently utilize WNA. This surprising statistic appears from the FAA's own DEIS.

Response 20 - The two- and three-engine wide-body aircraft are less noisy than the current mix of jet aircraft which use National. See Exhibit III-1 in the SDEIS and in the FEIS. The EPNdB levels referenced from the DEIS were FAR Part 36 noise level limits, not actual measured noise levels. Comparison of measured noise levels between aircraft can be accomplished by comparing the "measured EPNdB" columns in the DEIS Appendix 1. It should be noted that the noisier uncertified aircraft currently using National are not listed in the Appendix. Should the wide bodies be admitted to National, the majority will have measured noise

characteristics similar to the A300 measured EPNdB levels from Appendix 1 (the majority of the wide bodies are forecast to be the two-engine type - A300, B757, B767 and not the three-engine variety). These aircraft would replace, in many cases, the B727 aircraft. The more noisy uncertified version of the B727 does not appear in the Appendix. Comparison of the less noisy certified B727 with the A300 on takeoff shows measured EPNdB levels approximately 10 EPNdB less for the A300. This would be perceived by most people as a reduction in the noise levels by one-half.

Comment 21 - It has not been demonstrated to anyone's satisfaction that any wide bodies can be accommodated at National. Since not a single wide body has proved that is can be accommodated at National as yet, should all future traffic reductions be predicted on this wholesale change of aircaft type?

Response 21 - Wide bodies have been the subject of tests at National to the point that FAA is confident that the aircraft can be accommodated at the facility. Should an MWA policy decide to admit wide bodies, National would be rebuilt to more efficiently accommodate the forecast mix of wide bodies. Until the airport could be rebuilt, air carriers desiring to use wide bodies would submit an operating plan to FAA. FAA would review the operating plan and determine if the landside facilities could accommodate the proposed operating schedule.

Comment 22 - Most compelling of the concerns over wide bodies are those of safety.

Response 22 - The FAA has evaluated the safety aspects of wide bodies at National and has determined that these aircraft can safely use the facility.

Comment 23 - The 650-mile perimeter should be retained and the "grandfather" status of the seven cities now exempt from the rule should be withdrawn.

Response 23 - This perimeter option is included in the Reduced Activity Policy alternative and is under consideration.

Comment 24 - An immediate freeze on WNA growth is essential to avoid compounding the WNA problem.

Response 24 - A ceiling on activity at National cannot be segmented from the MWA policy any more than the decision to admit wide bodies to the facility. All of these issues must be resolved within the context of the policy effort. An immediate freeze at National would establish a second airport policy that would accompany the established MWA policy effort. This second policy would require rulemaking and the necessary environmental requirements.

Comment 25 - The COG wholeheartedly supports FAA's proposal for a 9:30 p.m. curfew on scheduled operations by airlines. It should be

stressed that this commitment includes not only scheduled departures from National, but also arrivals at National. It should be made specific that also it applies to operations of additional "sections" or augmentation units of scheduled flights. Those particular points should be clarified by FAA, making clear that arrivals at National are governed by the curfew.

The FAA announcement does not specifically include general aviation aircraft in the curfew restrictions. The wording FAA uses appears to limit the curfew application only to scheduled airlines and seems to exclude private and business aircraft. All general aviation jet aircraft should be required to conform to curfew restrictions, noise abatement procedures and other operating requirements which govern passenger airliners.

Response 25 - Three of the policy options under consideration contain operating curfews. However, none of these operating curfews begin at 9:30 p.m. The scheduling of air carrier and commuter flights would be limited to 9:30 p.m. for these three options with the operating curfew that closes the airport to follow later as detailed in the FEIS. The operating curfew would apply to all aircraft, including general aviation.

Comment 26 - The plan to reduce operating hours at National is commendable. We hope that the limitation of operating hours to 7 a.m. - 9:30 p.m. will be strictly adhered to. The present "curfew" from 10 p.m. to 7 a.m. has been only loosely observed; regular operations actually take place from 6:30 a.m. to 11 p.m.; jet flights are moving at low altitudes over densely populated residential neighborhoods almost constantly between these hours. A reduction in scheduled hours of operation is certainly desirable and careful policing of the curfew should be enforced. We recommend that a small fine of $100.00 be assessed to any carrier that takes off outside the stated operating hours. These funds are to be used to defray direct costs to FAA of airport operations.

Response 26 - There is currently no operating curfew at National. However, the airlines have volunteered not to schedule jet operations after 10:00 p.m. and before 7:00 a.m. The concentration of flights at the 10:00 p.m. minute (usually 18) means that on most nights it takes until 10:30 p.m. to conclude scheduled operations and sometimes later, when weather or mechanical problems delay scheduled flights. Three of the policy options would employ an absolute operating curfew. See response to Comment 25.

Comment 27 - Your proposed alternative for National's growth does not take effect, in the main, until 1990, and it includes increases in the growth of operations, not reductions. We citizens are not willing to wait 10 years for a negligible, if any, reduction in the noise we are compelled to live with generated by National operations. We ask that you consider weekly to monthly policy changes to reduce and eventually severely curtail operations at National, and we see no benefit to be derived from delay.

Response 27 - It is assumed that the selected MWA Policy would take effect in January 1981. Depending on the policy option selected, activity at the airport would be continually changing. The year 1990 was selected to show the impacts of the various policy alternatives after a period time where change had taken place.

Comment 28 - Lessening of noise from aircraft using National relies greatly on presumed retrofitting of the 2- and 3-engine jets. This may not occur. The final deadline for 4-engine planes is 1985, for 2- and 3-engine planes between 1981 and 1988, depending on type and technology of airplane. At this, with averaging of noise readings a plane does not have to comply in all respects. Further, while Congress appears firm at this point on the deadlines, we have no guarantee that a future Congress would not waffle.

Response 28 - The noise model assumes compliance with FAR Part 36 in 1990 for all aircraft. This assumption is reasonable given the current law and compliance dates.

Comment 29 - The airplanes currently do not adhere to air field closing hours at National, stacking at 10 p.m., landing at 4 a.m., etc. Since the model also relies on adherence to scheduled closing hours, this aspect of your model is inaccurate.

Response 29 - National Airport currently has no operating curfew. The airport is open 24-hours. There are voluntary scheduling and operating provisions for jets. Some of the policy options under consideration contain operating curfews for National. The noise model has been used correctly.

Comment 30 - The airplanes currently do not adhere to take off and landing patterns suggested by the National controllers, so again there is no reasonable expectation that this part of your model would work.

Response 30 - We have no evidence that aircraft ignore controller instructions. The noise model has been used correctly.

Comment 31 - The exhibits you use to show model contours over time are inaccurate. In my neighborhood, I noticed land designated as parkland that is actually residential and in one instance, in public use as a school. It is possible that there are other inaccuracies which you may need to check on a neighborhood-by-neighborhood basis. This is very important in terms of the effect of your proposed measures to deal with noise.

The use of wide body aircraft contemplated at National would require additions to the runway. Table 1 of this testimony indicates the "worst case" field lengths needed for take offs and landings of various sized passenger jets. Runway 18-36, presumably the one at National to be used for the wide bodies, is 6,870 linear feet. It is deficient in all instances for wide bodies taking off; and, incidentally, for many of the other 2- and 3-engine in current use at National.

Response 31 - The exhibits are as accurate as can be expected given the scale and size of the area under consideration. The use of wide body aircraft will not require additions to the runway. Aircraft weights are adjusted for field length and operating conditions to assure safe operation at National.

Comment 32 - You have already begun to ask for enlarging 18-36's safety over-run area, to the extent of a landfill in the Potomac of 8 acreas. In a letter to me of 3-17-80 from the Chief of the Engineering Staff of MWA, the extent of the safety hazard existing was described.

It is apparent that you want to enlarge this airport, regardless of environmental and public safety considerations, when the correct response to the facts regarding its use are drastic cutbacks in its operation. Any plane now inconvenienced by National's "overburdened and outdated" facilities, as the EIS refers to them, should fly in and out of Dulles instead, where the taxpayers have already provided them excellent facilities. We do not need duplication.

Response 32 - No decision has been made regarding a proposed safety over-run area, including a landfill in the Potomac. This proposal is for the purpose of increasing the level of safety. There is no safety hazard existing at National Airport. The FEIS contains a range of policy options that are under consideration.

Comment 33 - You have not addressed existing safety hazards at National now, an extremely important component of any EIS regarding an airport in the middle of an urban area. In attempting to gather this type of data, I hope you will be more successful than we have been. According to the Director of the MWA, such items as the average number and type of equipment breakdowns per month affecting control tower operations at National is "not readily available in the format desired."

As you are aware, your inadequate Runway 18-36 has already been cited as a safety hazard should accident conditions emerge during landing or take-off.

Response 33 - There are no safety hazards at National Airport. The safety record at National is excellent.

Comment 34 - You do not, in any way, address the need for citizen over-view of the policy and management of National and Dulles. This must be fully explored in any EIS, with inputs of various types of governmental bodies and citizen groups addressed.

Response 34 - There have been seven public hearings and two opportunities with a Draft EIS and a Supplemental DEIS for citizen input to an MWA Policy. The issue of the citizen advisory committee is proceeding independently from the MWA Policy effort.

Comment 35 - The flight tracks out of Runway 12 are misrepresented on Exhibit III-10. Rather than making a hard right turn after take-off, many flights only turn south some 32,000 feet out. These take-offs include Concord - which is not shown as so using Runway 12.

The discrepancy between theoretical and actual flight patterns results in an error in the plotting of the existing and planned noise contours for Dulles (Exhibits III-11, III-12). The NEF contours thus extend over a long settled noise sensitive area - the heart of the Navy-Vale community.

Response 35 - It is recognized that a theoretical noise model at this time can't exactly duplicate actual flight path conditions (i.e., actual dispersion about a theoretical path). The key purpose of a noise model is to evaluate the relative difference in noise impacts among policy options. The Aircraft Noise Monitoring System at Dulles monitors actual aircraft and community noise.

Comment 36 - Exhibits III-11, III-12 ignore the fact that much of the area to the East of Dulles (i.e. Navy-Vale) is a stable community settled at less than 1 d.u./acre. Thus, even if the NEF contours were accurately drawn, the impact of these contours would be understated.

Exhibit III-12 is specious in that it ignores--

(a) the twinning of Runway 12/30 planned for 1995 and
(b) development planned and committed and approved for the area on already rezoned land will have occurred by 1980 population densities are shown.

On both of these grounds we believe Exhibit III-12 to be inaccurate and misleading; understating the planned impact of the proposed policy.

Response 36 - The land use information on the Exhibits is intended to give general catagories of land use when comparing relative differences in noise impact for the policy options under consideration. One can always add detail in terms of land use. However, the main value of the noise contours is to show relative differences in noise impacts among policy options. The noise information along with other economic and environmental information will be considered prior to a policy decision. Noise impacts will not be the only consideration in making a policy decision.

None of the policy options include adding runways at Dulles. The land use information represents data that was availble at the time of preparing the EIS. It is incumbent that planning oranizations of local government use the noise information from the Dulles Master Plan in making land use and zoning decisions. The noise contours in this FEIS are not intended for zoning purposes. The Dulles Master Plan that assess the noise impacts beyond 1990 should be used for land use planning purposes.

Comment 37 - The current and proposed policy for Dulles both indicate that flight patterns will impact on "undeveloped, rural land" (pp III-30, III-34; both use the same term). This ignores the fact that Western Fairfax County (and Eastern Loudon County) are the location of a highly noise-sensitive industry--that relating to the care and breeding of horses.

In 1979, there were 4000 horses in Fairfax County, almost all concentrated in the western part of the County. These and their supporting establishments represented an investment of $190 million, with cash flows of about $25 million and employment for some 500 persons (excluding entrepreneurs). In short a non negligible industry.

Now horses are nervous animals reacting strongly, usually with flight, to loud noises such as are produced by lowflying aircraft. The most highly strung of horses-reacting the most strongly to noise-is also the most valuable-the Thoroughbred. Of the horses in Fairfax, 900 were Thoroughbreds...(If one includes other hot-blooded horses, the total would approximate 1100.)

These horses are valuable, nervous, and delicate. A panicky run as a result of noise can result in a destroyed horse and a loss of many thousands of dollars. Since breeding of Thoroughbreds is a part of the industry, one must also consider the possibility of loss of the foal through miscarriage--the loss could be as high as $1,000.00.

Beyond the economic factors of Thoroughbreds, there is also the safety factor. There are 770 ponies in Fairfax, and 1308 crossbreds. If one merely doubles the pony figure, it indicates some 1500 children potentially exposed to the risk of a bolting horse and a nasty fall because of inadequate attention to noise levels in Fairfax County's rural areas.

We believe it is essential that the potential problems of the equine industry be considered in establishing a policy for the expansion of Dulles.

Response 37 - See Response to Comment 36.

Comment 38 - The study was prepared in part as a result of a community outreach program in which FAA consulted with citizens groups as well as governmental bodies. These citizen groups were however confined to the National Airport area. The result is that the study concludes that we must be awoken early on the weekends so that the residents of Georgetown and Arlington may sleep late. This appears to be discriminatory and we ask that the problems of resultant bias be addressed in the final report.

Response 38 - The public hearing and review of the MWA Policy proposals have not been confined to the area around National Airport. Public hearings were held at Dulles and input by governmental, as well as citizens from the Dulles area, has been considered.

Comment 39 - The increase in commuter flight allocations over current levels should be combined with a rerouting of all commuter air traffic and all general aviation air traffic to follow the "river route" as contrasted to current practice to route this traffic over densely populated areas of south Arlington and Alexandria, or DC. An alternative would be not to increase this allocation or general aviation allocation, but simply to cut the total number of flights.

Response 39 - The MWA Policy options do not consider changes to existing flight procedures. In general, piston aircraft are turned from the Potomac corridor to separate these aircraft from the higher speed turbojets. There are no proposals to change these procedures. None of the policy options would lower the total slot level under the FAA High Density Rule (i.e., 60 IFR reservations per hour).

Comment 40 - The present 7:00 a.m. to 10:00 p.m. curfew for air departures from and to National are not enforced. Numerous aircraft are scheduled to depart about 10:00 o'clock each evening which means no lift-off from National until well after that hour and frequently until 11:00 because of unexpected delays.

Response 40 - There is currently no operating curfew at National Airport. This is pointed out in the SDEIS and this FEIS. Several of the policy options under consideration contain an operating curfew.

Comment 41 - National Airport should be closed immediately to private aviation (so-called "general aviation"). No airport should be operated where National is presently located, and if there has to be one, it should be open only to public aviation. This would be one very good way to reduce activity there and improve safety. It is well known that the mix of private planes and large air carriers is dangerous and has caused numerous accidents.

Response 41 - There are no policy options that would ban general aviation from National Airport. Such an option could be discriminatory. The safety record at National Airport is excellent.

Comment 42 - The chief impression left with me after reading this Environmental Impact Statement is that a deliberate attempt has been made to understate both the noise and air pollution impacts of Washington National Airport, particularly those impacts on residential areas.

One of the most offensive features is the frequent use of maps purportedly showing the noise-impacted areas. These maps are grossly misrepresentative of the true situation, at least in the areas south of the Alexandria city limits. The entire Mt. Vernon area of Virginia is seriously and adversely affected by aircraft noise from Washington National Airport, also the Potomac River at least as far south as Ft. Belvoir. There is no attempt to assess this damage; there is not even a paragraph recognizing that a problem exists.

Response 42 - The noise model in the Environmental Impact Statement has been used correctly and accurately. Areas outside of the contours should not be considered as free of noise impacts. See pages III-9 and IV-10 in the SDEIS.

Comment 43 - The noise measurements and measurement-terms used in the EIS are poorly described. Readers of an EIS should not have to perform additional research to understand the terminology used in the report. Three different kinds of noise measurement techniques are used (dBA, Ldn, NEF) to refer to similar sites or events; none is adequately discussed in language for the layman and nowhere are any of these related to the measurement standards used in the monthly Aircraft Noise Monitoring Report, which adds a fourth technique the layman must try to understand. This monthly Report documents actual aircraft noise readings at 23 monitoring sites along the flight paths of WNA and Dulles, and shows that the noise problems are serious well beyond the perimeters described in the EIS.

Response 43 - See pages III-1 through III-6 of the SDEIS. The Ldn noise metric is presented in the SDEIS and is contained in the Monthly Noise Monitoring Report.

Comment 44 - Table II-2. Identification of organizations, govenment agencies, and members of Congress in each category should be made. This brief summary is insufficient. The knowledge of exactly who stands for what is important to an understanding of this complex controversy.

Response 44 - This FEIS Appendix summarizes the comments received. However, identification of all parties individually is not practical given the large volume of comments. The docket of comments is public information and may be inspected at any time during normal working hours at the Office of the Director, Metropolitan Washington Airports, Hangar 9, Washington National Airport.

Comment 45 - Page III-5, 10. Discussions of the retrofitting program assume more progress than will actually take place. There has been a cutback in the time-table for retrofitting, unfortunately.

Response 45 - The EIS selects 1990 as an analysis year of the various policy options. The entire airline fleet will be in compliance with FAR Part 36 requirements by that year.

Comment 46 - Page III-23 sq. Parks Lands and Historic Sites. The EIS fails utterly to recognize the full range and gravity of the effects of WNA's operations on parklands and historic sites.

Response 46 - The impact on parklands and historic sites is assessed for all policy options in the EIS.

Comment 47 - Page III-28 sq. The claim is made that WNA is energy-efficient in terms of ground transportation. In the overall

picture of what is best for the city and the country however, that is a very minor factor. The longer route to Dulles or BWI would give tradeoffs that are fully compensatory. For one thing, the current fuel loss to delayed landings at WNA could be saved by diversion of flights to Dulles and BWI.

Response 47 - The energy impacts of the policy options are assessed in this FEIS.

Comment 48 - I could find no analysis of the impact of sound on people. I live with the noise from your airplanes constantly and sometimes find myself extremely irritable. Reports that I have read show that constant noise may be what is affecting me.

Response 48 - The DEIS (Appendix) of March 1978 contained, and the SDEIS, page III-3, referenced the FAA publication "Impact of Noise of People" available upon request to the Director, Office of Environment and Energy, Federal Aviation Administration, 800 Independence Avenue, S.W., Washington, D.C. 20591.

Comment 49 - There is no analysis of limiting flights to National to propeller driven planes. The noise would diminish to almost nothing, and the community could still be served. There is such a use of big and little airports in Dallas, Texas.

Response 49 - Closing National to commercial airline operations is not a policy option under consideration.

Comment 50 - I saw no analysis of a flight pattern which would disperse flights throughout the Washington area. Why must all flights go up and down the river. Let everyone live with my discomfort.

Response 50 - See the footnote on page III-9 of the SDEIS.

Comment 51 - I have commented in the past that I believe that the methodology used in development of the noise contours to be seriously deficient. Indeed, it appears to be on a technical level of undergraduate exercises in sound propagation. NO RECOGNITION IS MADE OF THE RELATIONSHIPS OF WIND DIRECTION, RELATIVE HUMIDITY, AND OPERATIONAL MODES AT NATIONAL AIRPORT.

Response 51 - The noise model considered wind direction and operational modes of the aircraft using National. The major value of the noise model is to assess the relative differences in noise impacts between various policy options under consideration. However, actual monitoring, such as with the Aircraft Noise Monitoring System, will always give the more precise noise information at a given location.

Comment 52 - The report states (III-5) "Approaches are assumed to follow tracks shown on Exhibit III-2..." The fact is that there are literally hundreds of takeoffs and approaches that do not follow the track shown.

Response 52 - Exhibit III-2 of the SDEIS show the flight paths used in the noise model. It is realized that all aircraft are not able to precisely follow these flight path lines at all times. However, the flight activity is usually closely distributed about the flight paths. Unfortunately, the model must assume a flight path and is not able to duplicate the natural distribution about the flight path. The major value of the model is to evaluate the noise impact of various alternatives or policy options under consideration. In terms of noise impacts, the values (Ldn) calculated by the noise model were very close (within 1 dB Ldn in many cases) to monitored levels from the Aircraft Noise Monitoring System.

Comment 53 - Again the report states (V-30) "As a result, many local citizens mistakenly view the 10 p.m. scheduling cutoff as an absolute operating curfew which FAA chooses not to enforce." It is almost unbelievable that the FAA would enter into a voluntary arrangement with the airlines, inform the public of it and then when the airlines violate it, state that it is a "misunderstanding on the part of local citizens." Is it possible that the FAA is so naive that it thought the airlines would observe a voluntary arrangement when it was in their interest to violate it? Why wait many more months to put the proposed curfew in effect? Why not do it now?

Response 53 - The airlines have not violated the scheduling arrangement. There is a voluntary scheduling limit after 10:00 p.m. where activity is no longer scheduled to arrive and depart. However, the concentration of scheduled activity at 10:00 p.m. means that aircraft completing this scheduled activity operate until a later time. Washington National currently has no operating curfew. Some of the policy options under consideration contain an operating curfew.

Comment 54 - The study gives no figures on the number of persons who live and/or work within the NEF 30 contours of Exhibit III-3. The statistics for the 59 "representative sites" indicate that many of them are subjected to very high noise levels for up to eight hours per day. How can intelligent policy choices be made without information on the numbers of people who are being subjected to the measured noise levels?

Response 54 - This information has been added in the FEIS.

Comment 55 - The January 1980 DEIS ignores the significantly greater impact on the communities north of Runway 18-36. This, by virtue of prevailing wind conditions, is the runway used for 80 to 90 percent of National Airport takeoffs.

Response 55 - Takeoffs to the north occur about 55 percent of the time during the year. This was included in the noise model.

Comment 56 - The Supplement does not recognize the validity of the relevant EPA noise standards (59 dbLN NEF 20). I find no specific

mention of the EPA standards anywhere in the report, and only one general reference to NEF 20 (on page II-10).

Response 56 - There are no EPA or federal noise standards for the operation of an airport.

Comment 57 - The Supplement does not add the 85, 75, 70, 65 and 60 dBA contours to exhibits and tables in terms of average dBA and threshold dBA or any other dBA measure, as I had recommended in 1978.

Response 57 - The format of the FEIS is, in our judgement, the better method of presenting the noise information.

Comment 58 - The Supplement shows no evidence that FAA has implemented the noise monitoring program for residential areas, as I had recommended in 1978, and which could provide useful empirical data for evaluating policy options.

Response 58 - See page III-6 of the SDEIS.

Comment 59 - Aircraft routinely fly well outside the parameters described in the Supplement as NEF 30 (Exhibit III-4 and elsewhere), often overflying the residential area between M Street SW and Fort McNair. The perceived altitudes of these overflights seems to be unnecessarily low. It is our understanding that these offending overflights are usually northbound departing jet aircraft whose Pilots-in-Command request (and are routinely granted) right turn-outs after departing from Runway 36; your Exhibit III-2 is clearly misleading.

Response 59 - The NEF 30 contour should not be interpreted as the corridor where all aircraft fly. See page III-10 concerning the contours of this noise metric. The right turn operation from Runway 36 does not represent a significant percentage of total north takeoff operations. The majority of aircraft use the flight paths shown on Exhibit III-2. The small percent of the right turn operation would not significantly change the noise contours.

Comment 60 - There is no estimate of the amount of air pollution caused by turbojet exhaust gases and carbon emissions, an obvious and obnoxious feature of aircraft operation over the neighborhoods.

Response 60 - See the Air Quality section of the FEIS and SDEIS.

Comment 61 - There is no estimate of excess energy costs due to the expenditure of jet fuel necessary in following preferential approach and departure paths in and out of WNA rather than the scatter pattern aircraft would normally follow if the former were not required.

Response 61 - Both the SDEIS and FEIS assess the energy impacts of policy options for Metropolitan Washington Airports. However, the

cooperative study effort between COG and FAA concerning the evaluation of flight path alternatives is a separate program from the MWA Policy.

The energy impacts of flight path alternatives will be assessed within the FAA/COG evaluation program.

Comment 62 - There is no estimate of energy costs resulting from the use by households in the impacted corridor areas of air conditioning units for the specific purpose of sealing off houses from the noise and engine exhaust pollution of low flying aircraft, even when air conditioning is unnecessary because the weather is such that a few open windows would provide adequate comfort.

Response 62 - There is no method to reliably assess scientifically such a phenomenon to the extent it actually exists.

Comment 63 - There is no reference to the actual medical and psychological effects on people living in impacted neighborhoods, such as those surrounding WNA, either a citation of previous studies or sample surveys taken in these neighborhoods. Given the fact that WNA is probably unique among all major civilian airports in the U.S. in the amount and extent of noise inflicted due to the volume of operations there, a survey of this type would certainly seem basic to the DEIS.

Response 63 - See Response to Comment 34 above. In addition, there are a number of airports where the number of citizens living within the NEF 30 noise contour is significantly greater than what occurs at National Airport. National Airport, in fact, has a greater number of restrictions because of noise than most airports of comparable size and activity.

Comment 64 - I would like to limit myself to two questions which I would like to have answered in the record: namely, why this is considered strictly a local problem? I know there are a lot of people, like me, who come from great distances. But who also are concerned about National Airport, which I will go into further.

Response 64 - The MWA Policy will involve national as well as local considerations. See the discussion in Section II of the FEIS.

Comment 65 - And also, the other question I would like to have answered in the record is why the FAA does not help others who come in from different areas to be aware of other alternatives that do exist in flying into Washington, D.C.?

Response 65 - There is a question of how appropriate it would be to use Federal funds to advertise alternate modes of travel to Washington or subsidize the advertising for private companies (i.e., the airlines). Essentially, the FAA owns and operates the two Federal airports. It is not the role of the FAA to subsize the airline advertising (i.e., use Dulles) with Federal funds.

MEMBERS of CONGRESS

Comments and Responses

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Members of Congress

Due to the similarity of comments, Members of Congress comments have been grouped by State. Comments from constituents of some Members of Commerce have been addressed in other sections of this Appendix.

Virginia

Comment 1 - I am pleased that the F.A.A. has come forth with this detailed analysis of alternatives for the future of Washington National Airport. In this proposed policy, airport area residents can find some degree of hope. Unfortunately, this is still not enough.

The Draft Environmental Impact Statement (DEIS) makes very clear that the key decisions by the F.A.A. will involve a tradeoff between private convenience and public health -- between relief to airport area residents or the continued brutal intrusion of jet noise into our daily lives. In my view, public health must take precedence over convenience for air travellers.

Air traffic at Washington National Airport must be reduced, and reduced significantly. The proposed policy includes elements designed to force a reduction in the total number of passengers, the total number of operations, and the hours of operation. Each of these elements should be implemented, but on a stricter basis than proposed in the policy.

Response 1 - The FEIS contains two policy options under consideration that would apply greater noise restrictions at National than the January 1980 MWA Policy Proposal (i.e., 16 Million Air Passenger Policy at National and the Reduced Activity at National Policy). The FEIS contains a range of policy options from which an MWA Policy will be drawn.

Comment 2 - The proposed Federal Aviation Administration policy regarding the operation of Washington National Airport is a matter of great concern to those of us interested in the quality of air service provided to the State of Virginia. I am writing to urge that the final policy preserve existing air service to cities within Virginia, and to other cities located within a short distance of the airport. This is the only policy consistent with the role of Washington National as the short-haul airport for the Washington area.

I strongly urge that the final FAA policy set aside certificated slots to maintain existing service to cities in Virginia and other short-haul cities and that it eliminate the proposed expansion of the perimeter rule.

Response 2 - The FEIS contains an environmental assessment of a

range of policy options. The FEIS shows historic and forecast changes in air service under the various policy options. See Table III-25 in the FEIS. Changes in air service can be measured by comparing the No Policy Change option in 1990 with the various other options in 1990. However, none of the options consider the allocation of slots within a user group (i.e., among the airlines or cities). This consideration will be evaluated in separate rulemaking that looks at the allocation of slots within a user group.

Maryland

Comment 3 - A 16 million passenger cap has been widely endorsed by state and local agencies and I urge that the proposed policy recognize this accepted figure, for reasons that will be presented to you by the State of Maryland and the Metropolitan Washington Council of Governments.

In short, I strongly urge that you give the deepest consideration to the comments submitted by COG and the Maryland Aviation Administration, keeping in mind that the present situation at National is odious to metropolitan area residents. An expansion of National's passenger capacity and facilities is not the answer. I strongly urge that the proposed policy be amended.

Response 3 - Two policy options under consideration assess a 16 million ceiling at National and a Reduced Activity Policy option that represents the recommendation of the Council of Governments.

Comment 4 - I understand that 15.1 million passengers were served by National in 1979. I believe that instead of allowing the ceiling to increase to 18 million, strong consideration should be given to cutting back to a firm ceiling of 14 million passengers annually.

Response 4 - The Reduced Activity Policy option assesses a 14 million ceiling at National.

Comment 5 - I support the efforts to establish a curfew on airport operations with one reservation. I believe that by having 9:30 p.m. as the latest scheduling time, but establishing 10:30 p.m. as the curfew, the airlines may be encouraged to cluster their final 18 schedules just before 9:30 and thus operations at the airport may extend to 10:30 p.m. on a regular basis.

Strong consideration should be given to establishing 10 p.m. as the absolute curfew (excepting emergencies). This would result in more significant relief to the citizens along the Potomac who currently are exposed to a tremendous night time noise burden associated with a final surge of flights.

Response 5 - Some of the policy options under consideration could employ a scheduling limit and an operating curfew. The scheduling

rollback and limit will eliminate the current bunching that occurs because of the 10:00 p.m. minute being treated as a scheduling hour. It is unlikely that the airlines would have no operations scheduled between 9:00 p.m. and 9:29 p.m. and the final 18 or less operations at 9:30 p.m. A curfew at 10:00 p.m. would be an unnecessary hardship for an occasional aircraft running late because of weather and mechanical reasons and would offer little in the way of added noise relief.

Comment 6 - Enforcement policy regarding curfews and extra flights is also of great importance. The proposals to permit no non-emergency airport operations before 7 a.m. and after 10:30 p.m., as well as strictly limiting the number of flights per hour, are positive and important steps. However, these proposed policies will be ineffective unless the FAA is committed to a much more rigid enforcement policy than is presently the case. There are far too many examples of extra flight sections and late night flights that have taken place in apparent violation of the intent of the current rules.

Response 6 - It is intended to make the MWA Policy a federal regulation. In regard to the current operating practices, National Airport has no operating curfew, only a voluntary scheduling and operating arrangement with airport users. National is open for 24-hour operations. Therefore, late night flights are not violating current rules.

West Virginia

Comment 7 - I am writing to express my objections to your proposed regulations which would phase out Washington National Airport by 1990, eventually, and more specifically, would change and limit service into that facility immediately.

Response 7 - The Department of Transportation has no proposal to phase out Washington National Airport.

Comment 8 - Reducing carrier operations, and going to more wide-body jets would seriously threaten service to short and medium-haul traffic points, specifically airports in my home State of West Virginia. Washington National is an important hub airport for many persons, where they can connect to other flights. Loss of available travel to Washington will effectively cut off any type of airline service for many parts of rural America.

Response 8 - See Response to Comment 2 above. In addition, commuter airlines currently serve West Virginia from National Airport. Some of the policy options under consideration would increase commuter slots.

Comment 9 - A reduction in flights and an extension or removal of the current 650 mile flight limit would severally and collectively be a distinctly adverse development and impinge harmfully on

Clarksburg, Fairmont, Bridgeport, Morgantown, and Harrison, Marion and Monongalia counties and the surrounding populations of Central West Virginia.

Response 9 - Clarksburg and Morgantown currently have exclusive commuter carrier service into National. Some of the policy options under consideration would increase commuter slots.

North and South Carolina

Comment 10 - Tom Davis, President of Piedmont Airlines, has written to me, expressing his concern about proposed rules for the operation of the Washington National Airport. I share his concern.

It is important that the National Airport retain its function as a short-haul airport serving a limited perimeter of cities. This is crucial to North Carolina because a large percentage of flights from our small cities connect with other flights here at National.

Response 10 - See Response to Comment 2 above.

Comment 11 - I am in receipt of a copy of William McG. Morrison, Jr.'s correspondence to your office concerning the Charleston County Aviation Authority's concern about the proposed reduction in available slots and the extension of the allowable stage length from 650 miles to 1000 miles. I would appreciate your assessment of this case being forwarded to my Charleston office at your earliest possible convenience.

Response 11 - Charleston currently does not have nonstop service into National Airport. See Response to Comment 2 above to assess the future potential service impacts under the No Policy Change and the other policy options under consideration.

Comment 12 - I fear that a reduction in the number of scheduled flights going out of Washington National together with the scrapping of the perimeter rule will mean that many of the flights from North Carolina may be "squeezed out." This would be extremely detrimental to air travelers from my State. I urge that when the final plans for Washington National Airport are adopted they be structured to preserve the vital function that this facility plays for North Carolinians.

Response 12 - See Response to Comment 2. In addition, none of the policy options under consideration would completely eliminate the perimeter at National.

Ohio, Kentucky, Tennessee

Comment 13 - I am very much concerned that the total impact of these changes may well result in a lessening of service between Louisville and Washington National Airport and between Greater

Cincinnati and Washington National Airport. While I cannot say with certainty that Louisville and Cincinnati will experience a decrease in non-stop service to National Airport, it is obvious that the decreases will occur in some markets. It is doubtful, however, that there will be any decreases in frequency in high density markets such as Chicago, New York, Boston, Pittsburgh and Atlanta. On top of the reduction in slots, there will be added competition for remaining slots from new major points such as Kansas City, New Orleans, Birmingham and Fort Lauderdale.

Response 13 - See Response to Comment 2.

Comment 14 - Why should activity be limited at Washington National? Your policy appears to fly in the face of the intent of Congress in passing the Deregulation Act of 1978. If we are to allow the market place to determine the distribution of service throughout the nation, then why not also allow it to determine service in Washington?

Response 14 - The FEIS contains an environmental assessment of a range of policy options. Any policy for Metropolitan Washington Airports will be consistent with deregulation. All of the policy options under consideration will permit continued access into the Washington-Baltimore region through one or more of its airports. However, deregulation does not remove from an airport operator all of his proprietary responsibilities in administering his airport(s).

Comment 15 - While we can understand your desire to increase the usage of Dulles International Airport, we don't feel that medium-sized, perimeter communities, who so desperately depend on downtown service to the Washington area, should be forced to shoulder the burden. Would it not make more sense to develop high-speed transportation service from Dulles to the downtown area so that it would be competitive with National? Was this type of service not included in the original development plans for Dulles and, if so, why has it not been developed?

Response 15 - Dulles Airport has, with limited exceptions, an exclusive-use access road which is currently proposed to be extended to Interstate 66. The median of that access road is reserved for possible future Metro Rail use. Necessary access will be added at Dulles to enable the facility to fulfill the role designated by the MWA Policy.

Georgia

Comment 16 - I have just received a letter from Mervin D. Dullum, Vice President of Delta Airlines, concerning the Federal Aviation Administration's proposed rulemaking concerning Washington National Airport.

I would like to express Delta's opposition to this proposed rulemaking, particularly those proposals which would include an 18 percent reduction in scheduled air carrier operations and a curfew starting at 9:30 p.m. The community in Atlanta also is expressing opposition to these proposals.

The Atlanta airport is the hub for both Delta and Eastern Air Lines. The effect of reducing the operations by imposing an earlier curfew would affect service to many communities throughout the southeastern United States. The reduction by curfew will knock out two arrivals and two departures from and to Atlanta. This will eliminate late evening service from Washington for many communities since the late evening Washington connections will no longer exist.

Response 16 - See Response to Comment 2. In addition, none of the policy options should reduce total available seats between Washington National and Atlanta. Some of the policy options would improve service over existing conditions. Service for cities connecting into National through Atlanta should not be disadvantaged to any significant degree by any policy option. Dulles and Baltimore-Washington Airports would also be available to service Atlanta travelers.

Comment 17 - Several aviation officials and airport community leaders in Georgia have expressed to me their deep concern with the potentially serious effects of reduced access to National Airport on air service from Georgia to Washington, D.C. I naturally share their strong desire that the Federal Aviation Administration proposals not result in less frequent or less convenient service to Washington from Georgia.

Response 17 - See Response to Comment 16 above.

Florida

Comment 18 - I fully support Mr. Goode's opposition to the reduction of flights between Miami and Washington National Airport. Retention of the current flight availabilities is essential to serve the large amount of business and tourist traffic to Miami.

Response 18 - See Response to Comment 2. The only policy option that would significantly impact Washington National-Miami service would be the Reduced Activity Policy option. All other options with widebodies should increase total seats and service between National and Miami.

Comment 19 - As for me personally, I commute almost weekly to Florida to my Congressional District. Because of high passenger loadings to the Sunshine State and the vagaries of Congressional schedules, it is already difficult to obtain reservations when I need them. Any further reduction in flights in and out of National Airport will make my travel nigh onto impossible.

Further, the present number of "slots" and existing commercial

schedules permit Florida constituents with business in Washington to make the trip up and back in the same day. This convenience would likely be lost if this proposal is implemented.

Response 19 - See Response to Comment 2. In addition, all policy options, except the Reduced Activity Policy option, should increase total seats between National Airport and Florida. Some of the options (1,000-mile perimeter) would result in new nonstop service between Florida cities, currently not holding such service, and National. Connecting service within Florida should not be significantly affected except for the Reduced Activity Policy option.

Comment 20 - I have genuine concern that the rules proposed will hinder effective air carrier service from National, particularly among smaller carriers new to the airport, while at the same time further aggravating one of the most pressing problems at DCA -- terminal crowding.

The practical effect of the reduction of "slots" for scheduled carriers accompanied with permission for wide body service will severely limit the ability of regional carriers (i.e. - Air Florida) to serve National with an adequate number of seats since the carriers cannot simply switch equipment from smaller jets to wide-bodies. While the larger carriers such as Eastern, Delta, Pan Am/National, etc. can make the equipment substitution, it will have the effect of reducing the number of flights available to the public and will further crowd the terminal at peak hours since the smaller craft now serving the airport will be replaced with 200-300 seat craft. If the facilities at National are already inadequate, how can it handle as many as twice as many passengers during peak hours?

Response 20 - It is assumed that the landside facilities (terminal) would be rebuilt once an MWA Policy is adopted. The terminal would be designed to fit the role defined by the MWA Policy. See Response to Comments 2 and 16 concerning air service. Finally, an MWA Policy can't be developed with only the interests of Air Florida in mind. Air Florida competes with Eastern, Pan Am and Delta in the Florida-Washington market.

Louisiana, Minnesota, Alabama

Comment 21 - As you know, it has been our position for years that the current, informal FAA policy limiting Washington National Airport nonstop operations generally to those cities within 650 miles and, specifically, to seven-named cities within 1,000 miles, has created a substantial inequity for the people of Louisiana. It goes without saying that we were pleased to learn from the FAA's supplement to the Metropolitan Washington Airports Policy draft environmental impact statement (DEIS) that the Agency has addressed the perimeter issue and has proposed as Alternative B of a well-balanced program an option which would formally enact regulations allowing nonstop service on a uniform nondiscriminatory basis for all cities within 1,000 miles, including New Orleans.

Of vital concern to my home state of Minnesota is the nonstop service perimeter issue in this proposed regulation for Washington. As you probably know, the Minneapolis-St. Paul International Airport is one of the few airports in the country which are permitted nonstop service beyond the existing 650-mile perimeter. Under the proposed regulation, two options are put forward in terms of redefining the nonstop service perimeter for National Airport. These options are: 1) to continue the existing 650 statute mile perimeter with the seven "grandfather city" exemptions; and 2) to allow all cities within a 1000 statute mile perimeter of National Airport to have nonstop service. While I think that both of these options are satisfactory, I am concerned that the local political pressure will force the Department of Transportation to adopt a stricter perimeter limit with no "grandfather" service.

We strongly urge adoption of the proposed DOT/FAA regulations establishing a 1,000-mile "perimeter" on non-stop flights to Washington National Airport. As you know, we have in the past expressed strong opposition to the informal "650-mile limit" which has unfairly prevented the City of Birmingham from obtaining convenient air service to the nation's capital. We agree with DOT/FAA that any limit on non-stop service to National Airport should be formally adopted through the rule making process, and we welcome this opportunity to offer our comments.

Response 21 - The FEIS contains a range of policy options with various perimeter configurations. All perimeter alternatives within the policy options are under consideration.

Wisconsin, North Dakota

Comment 22 - I share the Chamber's concern over the possible effects of the 9:30 p.m. curfew on late afternoon flights from Madison. A reduction of such service to National Airport would result in a major inconvenience for the many travellers between Wisconsin and Washington. This is especially true due to the fact that the late afternoon flights tend to be the most efficient for those who must make short business trips to the nation's capitol.

At the present time Northwest Orient and other airlines provide excellent service between Washington and North Dakota, most of them with one-stop service. Should your proposal be put into effect, I very seriously doubt, in fact I understand it is highly unlikely, that any such service will continue out of National.

Response 22 - The policy options have various scheduling and operating provisions that are all under consideration. There should be no major or significant impact to connecting service to these states under any policy option.

Comment 23 - At present, the perimeter limitation at Washington National is 650 miles; F.A.A.'s pending proposal would extend the distance to 1000 miles. Albuquerque would prefer that the peri-

meter restrictions be eliminated rather than extended. The direct flight distance between Albuquerque and Washington is 1643 miles.

Response 23 - See the discussion in the FEIS concerning the impact at Dulles with the perimeter at National removed. Elimination of the perimeter is not an option under consideration.

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